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October 8, 2025

Holly Anderson, PUC Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 24-2317-INV, Efficiency Vermont Comments Regarding Tracking Expenses for Participants Simultaneously in ESA Pilot and ESA Revised Program.

Dear Ms. Anderson,

On November 23, 2025 the Public Utilities Commission (“Commission”) filed an Order that addressed the Energy Savings Account (“ESA”) and Customer Credit Program (“CCP”) participation and tracking of funds. In the Order, the Commission requested that the Energy Efficiency Utilities (“EEU”), and the Department of Public Service (“Department”) identify any implementation issues related to simultaneous participation by those in both the ESA pilot and the revised ESA program. Additionally, the Commission requested that the EEUs confirm they will track the funds for the ESA pilot separately from the funds for the revised ESA program for simultaneous participants. This filing provides Efficiency Vermont’s response.

- i. The Department and Efficiency Vermont met to discuss any implementation issues related to simultaneous participation in the ESA Pilot and the Revised ESA program. Efficiency Vermont supports the Department’s recommendations in their October 8, 2025 filing.
- ii. Efficiency Vermont is able to track projects and expenses from the prior ESA pilot program separately from the Revised ESA program for simultaneous participants.

Sincerely,



Emily Roscoe
Regulatory Project Manager