From: No Reply <no-reply@tylervermont.com>
Sent: Wednesday, October 15, 2025 1:55 PM
To: PUC - Clerk <PUC.Clerk@vermont.gov>
Subject: Feedback on “Energy Burden in Vermont” Survey and Opportunities for Integrated Statewide Action

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Submitted on Wed, 10/15/2025 - 1:54 pm

Submitted by: Anonymous

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Subject
Feedback on “Energy Burden in Vermont” Survey and Opportunities for Integrated Statewide Action

Message
NVDA appreciates the PUC’s attention to energy burden among low- and moderate-income Vermonters. The Northeast Kingdom (NEK) continues to experience some of the highest energy burdens in the state. While Vermont's average energy burden is 11%, the NEK experiences some of the highest energy burdens ranging from 7-19% – adding up to around $7,000 in household energy spending annually. About half of NEK communities have greater than 6% combined thermal and electricity energy burden; over one-third have greater than 6% transportation burden. Nationally, an energy burden above 6% is considered high and is linked to increased financial stress and greater challenges maintaining long-term health and stability (ACEEE). We welcome the opportunity to contribute to the PUC’s report to the Legislature and to encourage a more integrated, equitable statewide approach to reducing household energy costs.

1. Integration Over Competition
The current survey structure appears to force trade-offs between energy needs – asking households to rank which costs matter most (thermal, electric, transportation) or which upgrades they prefer (weatherization, heat pumps, EVs, or appliances). In rural regions like ours, these needs are inseparable and simultaneous. Programs should be designed and funded as bundled, sequenced solutions that reflect the interconnected nature of

electrification, weatherization, and transportation. Choosing between them fragments progress.

2. Build on Existing Local Capacity
The NEK already has effective, locally trusted partners addressing energy affordability and efficiency — including NETO, NEKCA, Heat Squad, RuralEdge, USDA, as well as Efficiency Vermont and the distribution utilities. These organizations often serve the same households. The state's energy assistance framework should align with and invest in these programs collectively, rather than create parallel or siloed systems.

3. Empower Utilities to Collaborate
Distribution utilities (DUs) should be empowered and required to coordinate with each other – ensuring that all utilities are aligned and supported, especially smaller cooperative/municipal DUs. The PUC can play a constructive role by:
- Encouraging resource sharing among utilities (technical staff, equipment, marketing, grant administration, etc.).
- Requiring cross-utility collaboration plans in future filings.
- Integrating low-income and equity metrics into utility performance reviews, that are standardized and consistent across all DUs.

4. Simplify Access for Vermonters
The PUC's report should recognize that complexity is itself a barrier. Households shouldn't have to navigate multiple eligibility rules or applications across weatherization, electric, and fuel-switching programs. The Commission could recommend:
- A single statewide intake system for energy assistance and upgrades, that meets people where they are, and recognizes the barriers many Vermonters face, including limited internet access, computer skills, time, transportation, or familiarity with state/local programs.
- A shared data dashboard tracking outcomes across all programs.
- Legislative support for braided funding models that leverage federal and state dollars through unified delivery systems.

5. Set a Unified Statewide Energy Burden Goal
A clear, measurable statewide goal to reduce average household energy burden – e.g., "no household should spend more than 6% of income on total energy costs" – would align efforts across sectors.

The LEAP model and other state data already forecasts the number of heat pumps, EVs, and weatherized homes are recommended by 2030 and 2050. The PUC's report could use those forecasts to set stretch goals and track progress.

Vermont's clean energy transition will only be successful if it is experienced equitably. Rural and low-income households can't afford to choose between thermal, transportation, and electric improvements — they need an integrated path. NVDA urges the PUC to center integration, alignment, and accessibility in its recommendations to the Legislature.

Respectfully submitted,

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