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November 19, 2025

Holly R. Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620

Re: Case No. 25-2607-INV
Investigation into the City of Burlington Electric Department's operations and management practices

Dear Ms. Anderson:

On October 22, 2025, the Vermont Public Utility Commission ("Commission") issued an Order Opening an Investigation pursuant to Commission Rule 2.304 in the above-referenced proceeding. The Vermont Department of Public Service ("Department") requested the investigation to conduct a business process audit on internal quality controls, among other issues at the Burlington Electric Department ("BED"). The Commission requested a proposed business process audit including root cause analyses of issues identified in the Commission's July 31 letter request for proposal ("RFP") to be filed by today, November 19, 2025. The Department submits a draft RFP with these comments and we look forward to receiving any comments from the parties and the Commission.

Sincerely,

/s/ Jim Porter

Jim Porter

Director for Public Advocacy