

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-2607-INV

Investigation into the City of Burlington Electric Department's operations and management practices	
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Order entered: 12/19/2025

**COMMISSION COMMENTS REGARDING THE DEPARTMENT OF PUBLIC SERVICE'S
PROPOSED REQUEST FOR PROPOSALS**

On November 19, 2025, the Vermont Department of Public Service ("Department") filed with the Vermont Public Utility Commission ("Commission") a proposed request for proposals ("RFP") for a business process audit to be conducted at the direction of the Department as part of this investigation. The City of Burlington Electric Department ("BED") filed comments in response to the proposed RFP on December 12, 2025. In these comments, the Commission identifies two areas of concern regarding the RFP's proposed scope of work.

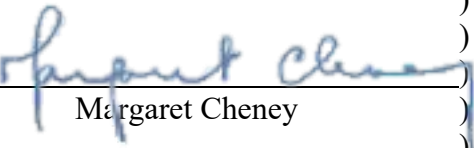
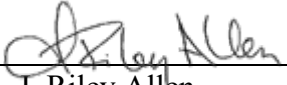
The proposed RFP includes a root-cause analysis as part of its scope of work. The scope of the root-cause analysis is "[f]or selected incidents identified in the Commission's July 31, 2025, letter." As we stated in the order opening this investigation, the Commission supports the inclusion of root-cause analyses as part of the business process audit. The broad scope of the root-cause analysis contemplated by the proposed RFP raises two potential concerns that we hope the Department will consider before finalizing and issuing an RFP.

First, the Commission's July 31 letter references an active investigation related to BED: Case No. 25-1010-INV is an investigation into BED's expenditure of certain energy efficiency utility and ratepayer funds in support of the District Energy System. We suggest that no root-cause analysis should be conducted in this investigation related to the scope of issues being examined in Case No. 25-1010-INV until that case has been concluded. Duplicative examination of the same events in both cases risks the development of differing conclusions and/or recommendations in each case. Moreover, until the Commission issues a final decision in that case, there has been no determination of any regulatory error or wrongdoing that would be the subject of a root-cause analysis.

Second, the proposed scope of work does not make clear whether the Department or the selected consultant will choose the incidents for root-cause analysis, and what criteria will be used to make those selections. It may be helpful in scoping the root-cause analyses if the Department selects specific incidents to be included prior to issuing the RFP, or if the RFP identifies which party will select the incidents and the criteria to consider for making the selections.

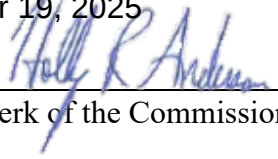
The Department is not required to file a revised proposed RFP with the Commission before issuing the RFP to solicit proposals from potential consultants.

Dated at Montpelier, Vermont, this 19th day of December, 2025.

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Edward McNamara	)	PUBLIC UTILITY
	)	
 _____	)	COMMISSION
Margaret Cheney	)	
	)	
 _____	)	OF VERMONT
J. Riley Allen	)	

OFFICE OF THE CLERK

Filed: December 19, 2025

Attest: 

Clerk of the Commission

PUC Case No. 25-2607-INV - SERVICE LIST

William F. Ellis
McNeil, Leddy & Sheahan
271 South Union Street
Burlington, VT 05401
wellis@mcneilvt.com

(for City of Burlington
Electric Department)

James L Gibbons
Burlington Electric Department
585 Pine Street
Burlington, VT 05401
jgibbons@burlingtonelectric.com

(for City of Burlington
Electric Department)

James Porter, Esq.
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620
james.porter@vermont.gov

(for Vermont
Department of Public
Service)

Darren Springer
City of Burlington Electric Department
585 Pine Street
Burlington, VT 05401
dspringer@burlingtonelectric.com

(for City of Burlington
Electric Department)

Emily Stebbins-Wheelock
City of Burlington Electric Department
585 Pine Street
Burlington, VT 05401
estebbins-wheelock@burlingtonelectric.com

(for City of Burlington
Electric Department)