



30 Main Street, Suite 500 | P.O. Box 1489 | Burlington, VT 05402-1489

May 6, 2026

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

Re: Case No. 25-0729-TF/Tariff filing of Town of Hardwick Electric Department requesting an overall rate increase of 13.24% effective with service rendered on or after June 1, 2025

Dear Ms. Anderson:

On April 16, 2025, the Town of Hardwick Electric Department (“HED”) filed a petition and revised tariffs requesting a 13.24% overall increase in its revenues, effective June 1, 2025, on a service-rendered basis. Pursuant to 30 V.S.A Section 225, the Department of Public Service (the “Department”) reviewed the filing and submitted its recommendation to the Public Utility Commission (“Commission”) on May 16, 2025. The Department recommended that the Commission open an investigation into the proposed rate increase. On May 29, 2025, the Commission issued an Order opening an investigation into the proposed rate increase, Case No. 25-0729-TF. No one filed for intervenor status in the docket.

On October 30, 2025, the Department submitted prefiled testimony stating that HED should be allowed a total rate increase of 4.84%, or an increase in revenues of \$342,561. The Department also filed the Prefiled Testimony of Scott Wheeler identifying concerns about HED’s billing practices for two sets of net-metering customers. In response, HED filed the Rebuttal Testimony of Steven Farman on December 24, 2025. This rebuttal testimony proposed several rate adjustments that were different than what the Department proposed in its October 30th testimony. It also addressed the net-metering billing practices. With permission from the Commission and the Department, HED filed the Supplemental Testimony of Steven Farman on March 13, 2026. This supplemental testimony proposed a three-step process for addressing the net-metering billing concerns:

- Change the methodology it uses for net-metering billing by May 1, 2026, through manual calculation
- File a report in this case by July 1, 2026, on whether its software vendor can automate the net-metering billing calculation
- In a separate case, file a report by September 1, 2026, on the previous billing methodology’s impact on customers

On April 30, 2026, the Department filed surrebuttal testimony. The Surrebuttal Testimony stated: “[T]he Department recommends that the Commission approve HED’s proposed billing revisions,

timeline for implementation, and open a new investigative proceeding to identify the fairest and most efficient approach to address any historic impacts on HED's customers." This recommendation was contingent upon HED confirming that the changes to its net-metering billing will apply to individual customers (PUC Rule 5.126(A)(2)) and group customers (5.126(A)(3)). HED can confirm that it has already switched to the new methodology for both individual and group customers. Additionally, the Department's surrebuttal testimony stated that HED should be allowed a total rate increase of 6.84%, or an increase in revenues of \$484,604

After reviewing the Department's supplemental filing and having additional conversations with the Department, HED has agreed to reduce the overall rate increase to 6.84%. HED requests that the Commission issue an order approving a total rate increase of 6.84%, or an increase in revenues of \$484,604. In addition, HED requests that Commission approve the plan for dealing with the net-metering billing issues. HED and the Department do not believe there needs to be any additional procedural steps in this docket. Once approved, HED agrees to refund the entire amount that it collected above that 6.84% overall rate increase since June 1, 2025.

Witnesses from HED, VPPSA and the Department are available to answer any further questions from the Commission as needed in writing or at a hearing, at the Commission's discretion. Thank you for your attention to this matter, and please me know if you have any questions.

Regards,



Elijah D. Emerson

Cc: Department of Public Service (via ePUC)