

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Investigation into the Establishment of)
Reduced Rates for Low-Income) Case No. 20-0203-INV
Residential Ratepayers of Vermont)
Electric Utilities)

**WASHINGTON ELECTRIC COOPERATIVE, INC.'S ANSWERS TO
QUESTIONS IN APRIL 1, 2020 ORDER ESTABLISHING SCHEDULE &
NOTICING WORKSHOP**

WEC provides the following answers to the questions posed by the Commission in in April 1, 2020 Order:

1. Should this proceeding be broken into two tracks, one track to consider GMP's Energy Assistance Program and a second track to deal with the other Utilities that currently do not have a low-income program? (If a two-track process is adopted, I expect that the two tracks would not be isolated from each other but, rather, would inform one another.)

Response: The one-track process would be more efficient, providing that all utilities have input into how the program is developed and the GMP program is not simply adopted. It would be good to involve GMP so that all utilities understand their model, what has worked, what has not worked, and how the model could be improved.

2. Should the proceeding consider a state-wide low-income program, or should it consider a service-territory-by-service-territory low-income program?

Response: The proceeding should consider a state-wide low-income program and allow for unique program offerings for utilities that seek to propose an alternative design to a statewide design. Having some flexibility over a standard or statewide initiative could help create extra value-added elements if a utility sought to add additional or other

features. The program should be based on the existing statewide income eligibility guidelines. Those guidelines should be sensitive to each utility's distributions service territory and their corresponding demographics (respective members' energy burden).

3. Should low-income programs be supported by ratepayer funds, by a state tax, or by other means?

Response: We do not support another utility-based fee, like the EEU charge. The program costs should be shared equally among all residents of the state of VT thru a statewide means, not exclusively utility ratepayers.

4. Should the benchmark for "low income" be 150 percent of the current federal poverty level, or should it be at another level, such as 180 percent or 200 percent?

Response: The existing statewide income eligibility criteria (household income, size, and local demographics) should be used. Those guidelines should be sensitive to each distribution utility's service territory and their corresponding demographics (respective members' energy burden).

5. Do the Utilities have access to reliable information about how many qualifying low-income consumers reside in their service territory compared to how many non-low-income consumers?

Response: The Utility does not maintain or request financial information from our members, and we think it would be imprudent to do so in the future. Privacy of our members is paramount and WEC does not support being directly involved in collecting and monitoring income. We have limited access to data provided by state assistance programs such as Capstone. This information does not provide how many qualifying low income and or non-low income consumers reside in WEC's service territory.

6. Do the Utilities have the technological and human resources infrastructure to design and implement a low-income program?

Response: WEC does not have the necessary technology or personnel resources to design, implement and administer a low-income program. The utility does not want to be responsible for maintaining member private information which adds an additional level of security and privacy requirements.

7. Can the Utilities present potential low-income programs that could illustrate what a low-income program in their respective territories might look like and what it might cost to operate such a program?

Response: As part of WEC's recent rate design order, 19-1270-IF, WEC was directed to work with the Department on developing a program to support low-income members. It would be more efficient to develop this program in conjunction with other utilities as part of this current effort.

Dated at Montpelier, Vermont, this 27th day of May, 2020.

WASHINGTON ELECTRIC COOPERATIVE, INC.



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