

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 20-0203-INV

Investigation into the establishment  
of reduced rates for low-income residential  
ratepayers of Vermont electric utilities

**Responses to Commission Requests for Information**

Green Mountain Power (“GMP”) submits the following responses to the Public Utility Commission (“Commission”) requests for information set out in the Commission’s May 1, 2020 Order:

1. Should this proceeding be broken into two tracks, one track to consider GMP’s EAP and a second track to deal with the other Utilities that currently do not have a low-income program?

Answer: While GMP believes a single proceeding would be more efficient, GMP will participate in both tracks if helpful for other utilities to consider how to set up a reduced rate program. GMP has a lot of experience we can share, and an EAP program that has worked well overall that could be the starting point.

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

Answer: The proceeding should likely consider both options – statewide and by utility. There are benefits to both, though a statewide program may require additional legislative action whereas a by utility program would not. Perhaps a workshop to discuss with participants the options makes sense before continuing with a proceeding.

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

Answer: There are many models nationwide that are used to fund these programs, with different sources and features – some with discount features; others with discounts and arrearage forgiveness combined; etc. – and funding source viability can vary by utility territory. Meanwhile a state funding source would have challenges and would likely require legislation, rather than PUC action. GMP believes its program has worked reasonably well so far, within the limits it has.

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?

Answer: GMP’s EAP program is set at the level allowed by statute; legislative action would be needed to change it. GMP agrees that tying a reduced rate program model to the Federal Poverty Level (FPL) would make sense as long as there is some programmatic flexibility to change criteria as the FPL changes (to ensure solvency, etc.). Ideally, the EAP program would have criteria that mirror or are modeled on the Federal LIHEAP model, and both programs would change together. A higher threshold would likely help increase enrollment in GMP’s program, as noted by the review conducted by GDS Associates last fall.

5. Do the DUs 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?

Answer: In our experience, generally yes. Data is available through the U.S. Census and state sources; however, at times the data sources are not as detailed or as up to date as the DUs may be looking for, requiring some level of assumptions regarding each DU’s specific service territory.

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

Answer: GMP does not have information available to comment on the infrastructure or resources of the other DUs. GMP partnered with the Department of Children and Families (DCF) for design of GMP’s EAP program, and DCF administers our program. Costs for administration are part of the current funding mechanism for the program.

7. Can the DUs 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?

Answer: We believe the GMP EAP program could be a starting point for others, understanding that different utility territories have different challenges regarding funding source and implementation. GMP suggests that an educational workshop to understand variety of models that are out there might be a good step to take, rather than requiring initially each DU to present different program designs.

8. [Optional] Additional questions or issues GMP would like to have raised in this proceeding:

Answer: As noted above, the GMP EAP program criteria is currently set at 150% of FPL, by legislation. If a different level were set for other DUs or a statewide program, GMP would support a legislative change to a higher percentage of FPL. However, that could also be deferred for later or separate consideration if prompt implementation of other programs is a key goal. GMP also remains very interested in ways to expand to more customers alternative energy assistance programs, such as the Solar Energy Assistance Program GMP filed and the PUC approved earlier this year, and we would be happy to provide information on this subject if helpful in this proceeding or separately.

Dated this 1<sup>st</sup> day of June, 2020.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Mary Morris', with a horizontal line underneath it.

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