

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)

COMMENTS OF
THE TOWN OF STOWE ELECTRIC DEPARTMENT

The Town of Stowe Electric Department offers the following comments in response to the Public Utility Commission’s April 1, 2020 Order in the above-captioned proceeding:

- 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.)

The Town of Stowe Electric Department (“SED”) supports the concept of breaking this proceeding into two tracks, but would also support an initial joint phase of the proceeding to review lessons learned from GMP’s efforts to develop and launch its EAP. This initial phase of the proceeding could include review of the November 2019 Assessment of the GMP EAP commissioned by the Department of Public Service, direct feedback from GMP to the other utilities, and could also involve stakeholders such as the Vermont Department of Children and Families (“DCF”) and Community Action Agencies (“CAAs”) that help administer GMP’s EAP and that would presumably be instrumental in the development and implementation of additional programs across the state.

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

Both state-wide and utility-specific programs should be considered as part of this proceeding. Understanding the advantages and disadvantages to each approach, both to the utilities and other stakeholders involved in implementing the programs, will be

important to developing cost-effective programs that serve all ratepayers without overburdening the utilities or program partners.

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

SED does not support a rate-payer funded low-income program, the costs should be spread to a larger pool of Vermonters, not just electric ratepayers.

- 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?

SED does not have an opinion on this question at this time. Section 218(e) defines “low-income electric utility customer” as one with a household income below 150 percent of the current federal poverty level, but SED also appreciates the perspective discussed in the November 2019 Assessment of GMP’s EAP that making the income threshold consistent with other Vermont assistance programs could streamline enrollment and increase program participation.

- 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?

SED does not have access to information about how many of its customers would qualify as low-income. Either the DCF or the Department of Taxes would need to be consulted to obtain these statistics. SED does not have this information in the aggregate, nor does it currently collect, maintain, or have access to such information with respect to any specific customer. Moving forward, SED also does not want access to such customer information and favors collaborative program designs where participants would be qualified for participation by DCF or CAAs rather than directly by the utility.

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

Ultimately, SED’s ability to implement a low-income program will depend on the design of the program and the extent to which other stakeholders are involved with and

participate in administering it. SED is likely more able to implement a program consisting of a single new rate for low-income customers where eligibility is determined by DCF or CAAs, than it is able to administer a more complex program requiring new programming or bill design, or if it is required to screen participants for eligibility internally.

- 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?

SED is not prepared at this time to provide potential program designs for its service territory or estimate their costs. It looks forward to working through these questions as part of this proceeding in consultation with the Commission, Department, other utilities, and other stakeholders.

Dated at Richmond, Vermont, this 1st day of June, 2020.

STACKPOLE & FRENCH LAW OFFICES

/s/JDH

By: _____
Jeremy D. Hoff, Esq.
Attorney for the
Town of Stowe Electric Department

Jeremy D. Hoff, Esq. (ERN 4372)
Stackpole & French Law Offices
P.O. Box 819
Stowe, VT 05672
t.802.253.7339
f.802.253.7330
jhoff@stackpolefrench.com