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April 29, 2021

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

**Re: Case No. 20-2022-INV, Calculation of the Efficiency Vermont Energy Fixed Monthly Efficiency Charge ("EEC") Rates for Year 2021**

Dear Ms. Anderson,

On April 9, 2021 Efficiency Vermont filed a proposal for the 2021 Fixed Monthly Energy Efficiency Charge ("EEC"). On April 13, 2021 the Vermont Public Utility Commission ("Commission") issued a Procedural Order for comments on the proposal. On April 14, 2021 the Vermont Public Service Department ("Department") filed a request to enlarge the comment period by two weeks. On April 16, 2021, Efficiency Vermont filed comments supporting the extension and a request to extend the schedule one more week to May 13, 2021. On April 22, 2021, the Commission issued an Order enlarging the deadline for comments.

With this letter, Efficiency Vermont is submitting a revised calculation of the 2021 Fixed Monthly EEC. Efficiency Vermont has coordinated with the Department to revise assumptions about energy consumption that provides the basis for the average annual consumption by rate class used to establish the average monthly fixed charge. Efficiency Vermont has made the following changes to its original proposal:

- Consistent with the Department comments and the Commission's Order of November 5, 2020 in Case No. 20-2022-INV, Efficiency Vermont has removed the projected changes to consumption for the commercial and industrial sectors;
- The gross consumption estimate for net metered customers was corrected from six months to account for a full year of net metering production;
- Other formulaic errors in the calculation of 2020 rates workbook filed on September 23, 2020 were corrected with minor impacts on the results; and
- Consumption and demand data from the Industrial Demand class and the Commercial Demand class were revised to correct previous data mis-categorization.

Attachment A includes individual worksheets documenting the original calculations of the Fixed Monthly EEC, corrections to the original, and a new set of calculations inclusive of the changes described above. Table 1 provides the Fixed Monthly EECs by rate class and Appendix A outlines the modified 2021 EEC rate schedule to include Fixed Monthly EEC rates.

Table 1. Energy Efficiency Charge 2021 Fixed Monthly Fees by Customer Class

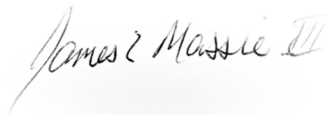
<b>Customer Rate Class</b>	<b>Original Fixed Monthly EEC</b>	<b>Revised Fixed Monthly EEC</b>
<u>Customers without Demand Charges</u>		
• Residential	\$6.68	\$6.80
• Commercial	\$6.13	\$6.33
• Industrial	\$713.86	\$586.49
<u>Customers with Demand Charges</u>		
• Commercial	\$77.74	\$85.53
• Industrial	\$1,854,23	\$1,915.71

Conclusion

Efficiency Vermont has coordinated with the Department to revise its original calculations of the Fixed Monthly EEC that are now believed to be in conformance with the Department’s comments of September 30, 2020, and the Commission’s Order of November 5, 2020. The changes are not expected to produce a material impact on the EEC collections from the customers to whom these fixed monthly EEC apply for the second half of 2021. Efficiency Vermont has shared an advance copy of this submission and attachments with the Department.

Efficiency Vermont requests that the Commission take such actions as necessary to approve this request. Please do not hesitate to contact me if you have any questions.

Sincerely,



James E. Massie III  
Budget and Reporting Director

## Appendix A – 2021 EEC Rates

The 2021 electric EEC rates shall be as follows for customers of all utilities except for Burlington Electric Department:

### Rates for Customers Without Demand Charges

Residential \$0.01188/kWh

Commercial \$0.01024/kWh

Industrial \$0.00757/kWh

### Rates for Customers with Demand Charges

Commercial demand customers \$0.00662/kWh plus

\$1.13825/kW

Industrial demand customers \$0.00521/kWh plus

\$1.21316/kW

### Rates for Unmetered Street and Security Light Customers

\$0.01024/kWh times the nominal wattage of the light times 360 hours per month

### Monthly Fixed Fees for Net-Metered Customers without Gross Consumption Meters

Residential \$ ~~6.68~~ \$ 6.80 per month

Commercial without demand \$ ~~6.43~~ \$ 6.33 per month

Commercial with demand \$ ~~77.74~~ \$ 85.53 per month

Industrial without demand \$ ~~713.86~~ \$586.49 per month

Industrial with demand \$~~1,854.24~~ \$1,915.71 per month