



May 14, 2021

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

Re: Case 20 – 2022
Calculation of Fixed Monthly Energy Efficiency Charge

Dear Ms. Anderson,

Pursuant to Public Utility Commission (“Commission”) Rule 5.303(B)(2), the City of Burlington Electric Department (“BED”) submits for review and approval the attached calculation of its 2021 electric energy efficiency charge (“EEC”) for net metered customers who do not have the equipment (i.e. generation meter) necessary to determine their gross kWh consumption. Upon Commission approval, the fixed monthly EEC will go into effect on July 1.

The methodology used to calculate the fixed monthly fee is described below:

1. Total BED 2019 retail kWh consumption by customer class is divided by the average number of BED customers during 2019 = **Average annual kWh consumption by customer class.**
2. Average annual kWh consumption by customer class is divided by 12 = **Average Monthly kWh consumption by customer class.**
3. Average Monthly kWh Consumption by customer class is multiplied by the existing EEC charge/rate by customer class = **Flat, fixed EEC monthly charge.**

The above calculation will be applied to 13 residential net-metering customers served under BED’s R3 tariff who do not have a generation meter. Their flat fixed monthly EEC will amount to \$3.55, a decrease of \$0.85, on average.

Three commercial customers served under BED’s small general service (“S3”) tariff will be affected by this rule amendment. Their flat fixed monthly EEC will amount to \$4.08, a decrease of \$3.65, on average. All other customers served under BED’s large general or primary service



tariffs are unaffected by this rule change as they have generation meters installed on their premises.

BED notes however that the above proposed EEC rates for net metered customers who do not currently have a generation meter may be revised in the future as a result of the Commission's determination in Case 19 - 3272. After a ruling is issued in that proceeding , BED will submit a compliance tariff with the appropriate revisions to this flat EEC to reflect changes to the EEC volumetric rate. In the meantime, BED requests approval of the above referenced proposed flat fixed net metered rate for R3 and S3 customers.

Should the Commission have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Thomas Lyle,
Programs and Policy
Burlington Electric Department
585 Pine Street
Burlington Vermont 05401
Tel: 802-922-3204



Appendix A

Month	SG Customers	SG kWh Sales	RS Customers	RS kWh Sales
Jan-2019	3,037	1,568,747	16,881	7,662,842
Feb-2019	3,027	1,743,829	16,852	8,362,089
Mar-2019	3,014	1,496,860	16,822	6,885,920
Apr-2019	3,044	1,436,706	16,907	6,667,534
May-2019	3,037	1,233,469	17,345	5,663,260
Jun-2019	3,036	1,242,215	17,796	5,331,812
Jul-2019	3,102	1,439,880	17,024	6,628,336
Aug-2019	3,128	1,659,939	17,095	8,345,826
Sep-2019	3,203	1,437,808	17,050	6,780,797
Oct-2019	3,128	1,274,312	17,008	5,626,722
Nov-2019	3,076	1,330,890	16,992	6,197,771
Dec-2019	3,031	1,452,687	17,006	7,058,817
Total	3,072	17,317,342	17,065	81,211,726

	SG Customers	RS Customers
<i>Average Annual kWh Use Per Customer</i>	5,637	4,759
<i>Average Monthly kWh Use Per Customer</i>	470	397
<i>Current EEC Rates</i>	\$0.00868	\$0.00894
<i>Monthly EEC Flat Fee</i>	\$4.08	\$3.55