

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No 20-2022 INV

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Determination of 2022 Energy Efficiency Charge Rates	
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**DEPARTMENT OF PUBLIC SERVICE COMMENTS ON  
CITY OF BURLINGTON ELECTRIC DEPARTMENT 2021 FIXED MONTHLY  
ENERGY EFFICIENCY CHARGE RATES**

On May 14, 2021, City of Burlington Electric Department (“BED”) filed a proposal with the Public Utility Commission (“Commission”) for its 2021 Fixed Monthly Energy Efficiency Charge (“EEC”). On May 18, 2021 the Commission issued a Procedural Order requesting comments on BED’s proposal by June 1, 2021. With this filing, the Department of Public Service (“Department”) confirms its support of BED’s Fixed Monthly EEC proposal and recommends the Commission’s approval of BED’s request.

The Department notes, based on review of BED’s calculations and further communication with BED, the proposed flat fixed monthly EEC results in EEC rate decreases that are more accurately characterized with the following modified descriptions<sup>1</sup>.

- 1. The 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~~ from their previous average monthly bill under the existing rules.*
- 2. 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*

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<sup>1</sup> City of Burlington Electric Department description of EEC rate changes from its letter filed in the case on May 14, 2021.

amount to \$4.08, a decrease of \$3.65, ~~on average from their previous average~~  
monthly bill under the existing rules.

Further, the Department notes, that Rule 5.303(B)(2) states that the “fixed monthly EEC shall be determined by rate class and shall be based upon the average *statewide* monthly consumption and demand for the previous year.” The Commission should be aware that the proposal utilizes BED territory data, not statewide. The Department supports BED’s use of its own service territory data and believes it is a reasonable interpretation of the intent of the Rule. Particularly because Section 5.305(A) of the Rule, related to the EEC calculation methodology, states “the electric EEC rates shall be calculated on a statewide basis, except for the service territory of BED.”

Thank you for the opportunity to comment.

Dated at Montpelier, Vermont this 1<sup>st</sup> day of June, 2021.

VERMONT DEPARTMENT OF PUBLIC  
SERVICE

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