

1 STATE OF VERMONT  
2 PUBLIC UTILITY COMMISSION

3 CASE NUMBER 20-0203-INV  
4

5 INVESTIGATION INTO THE ESTABLISHMENT OF REDUCED  
6 RATES FOR LOW-INCOME RESIDENTIAL RATEPAYERS OF  
7 VERMONT ELECTRIC UTILITIES  
8  
9

10 July 8, 2021  
11 1:30 p.m.  
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14 Workshop held before the Vermont Public  
15 Utility Commission via GoToMeeting video conference on  
16 July 8, 2021, beginning at 1:30 p.m.

17 P R E S E N T

18 Commissioners: Anthony Z. Roisman, Chairman  
19 Margaret Cheney  
20 Riley Allen

21 Staff: John Gerhard, Staff Attorney  
22 Elizabeth Schilling, Staff Attorney  
23 Kyle Landis-Marinello, General Counsel

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P A R T I C I P A N T S

Erin C. Brennan, DPS  
Carol Flint, DPS  
Gina McHugh, DPS  
Steve Costello, GMP  
Scott Anderson, GMP  
Nicole Bagley, GMP  
Malachi Brennan, Dunkiel Saunders  
Richard Hasselman, GDS  
Melissa Bailey, VPPSA  
Ken Nolan, VPPSA  
Amanda Simard, VPPSA  
Amber Widmayer, BED  
Andrea Cohen, VEC  
Michael Lazorchak, Town of Stowe Electric Department  
David Mullett, Allearth Renewables, Inc.  
Richard Shems, Tarrant, Gillies, Richardson & Shems  
Philene Taormina, AARP  
Karen Wescom, Village of Hyde Park  
Matthew Walker, Efficiency Vermont, VEIC

1           MR. GERHARD: Good afternoon. This is a  
2 workshop in Case Number 20-0203-INV. It's the  
3 investigation into the establishment of reduced rates  
4 for low-income residential ratepayers of Vermont  
5 electric utilities. And, as I mentioned before, my  
6 name is John Gerhard. I'm an attorney with the  
7 Commission, and I've been appointed to serve as the  
8 hearing officer. Along with me today, Elizabeth  
9 Schilling is going to be our platform manager for the  
10 GoToMeeting platform space. So she will help us with  
11 any technical issues that may arise.

12           Also today on the workshop is Kyle  
13 Landis-Marinello, our general counsel. He's also part  
14 of the team that staffs this case. And then, finally,  
15 we have all of our commissioners here with us today,  
16 Tony Roisman, Margaret Cheney, and Riley Allen, and I  
17 believe they will be participating in the workshop to  
18 varying degrees. I think they have some questions and  
19 they wanted to observe the proceedings.

20           So, with that, one quick question for everyone.  
21 If there is a party who intends to record the workshop  
22 either via video or audio, if you could just let the  
23 court reporter know that you're going to be doing that  
24 by sending her a chat message, that would be helpful.

25           And that leads us on to appearances today. We're

1 going to do it a little bit differently today, because  
2 we have so many people on the call and because it's  
3 electronic. So what I'd like to do is I'd like to ask  
4 the Department and GMP to introduce themselves and  
5 their consultants that they're working with, and, for  
6 the remainder of the group, we're not going to ask you  
7 to announce appearances. What I will try and do is get  
8 an accurate list, and I'll work with the court reporter  
9 to make sure the people who have attended are  
10 accurately reflected in any of the notes in the record  
11 for this case.

12 So if we could start with the Department.

13 MS. BRENNAN: Good afternoon, everyone. My  
14 name is Erin Brennan, and I am special counsel with the  
15 Vermont Department of Public Service. With me today I  
16 have Carol Flint, who is the director of the  
17 Department's Consumer Affairs and Public Information  
18 Division. I also saw Gina McHugh on the call, who is  
19 our Utilities Financial Analyst, and we also have Rich  
20 Hasselman, who is a managing director at GDS  
21 Associates, the Department's retained consultant for  
22 this proceeding.

23 MR. GERHARD: Thank you. Let's turn to GMP  
24 then, please.

25 MR. COSTELLO: Hi, good afternoon. My name

1 is Steve Costello. I'm the Vice President at Green  
2 Mountain Power, and with me are Scott Anderson, who is  
3 our manager of rates and familiar to many of you, and  
4 financial analyst Nicole Bagley.

5 We're really pleased to be here and looking  
6 forward to continuing to work with the DPS and the  
7 consultants from GDS, you know, as we work to continue  
8 to make the EAP a success for our low-income customers  
9 and to help others. It really has been a great thing.  
10 It's helped thousands of customers. And we look  
11 forward to the workshop today and working with all of  
12 you going forward.

13 MR. GERHARD: Fantastic. Thank you so much.  
14 Due to the, you know, the ongoing pandemic, I think  
15 we've all become accustomed to that, but the Commission  
16 is limiting in-person contact by having this workshop  
17 conducted remotely, and, as I mentioned before, we're  
18 going to use the web-based platform GoToMeeting. So,  
19 during this workshop, we'll be using some special  
20 procedures that we've developed to help us do the  
21 web-based platform more smoothly. I'm going to read  
22 them now for the benefit of those of you who have not  
23 been party to one of our electronic workshops and just  
24 to ensure that we have them on the record.

25 So participants may raise concerns about the

1 procedure either now or at any point during the  
2 workshop if the platform isn't performing as expected  
3 or if you're having any kind of technical difficulties.  
4 We expect the workshop will probably proceed a little  
5 more slowly than usual. We may need to stop along the  
6 way to resolve technical issues, things like that. We  
7 also recognize that, since everybody is remotely  
8 participating, there could be some unexpected  
9 interruptions at each of the individual locations.

10         Anyone who's anticipating speaking during the  
11 workshop, we ask you to keep your cameras on during the  
12 entire workshop, please. It's helpful for us to see  
13 you, particularly when you're speaking. For those of  
14 you who do not think you're going to be speaking, if  
15 you just plan to listen throughout the workshop, it's  
16 probably best for you to turn your camera off. Even  
17 with the camera off, you don't have to worry. You'll  
18 still be able to see everyone who has their camera  
19 turned on. You'll be able to hear what is being spoken  
20 about. It just kind of makes it easier for those of us  
21 who are speaking to all fit onto the small screens that  
22 we're looking at.

23         Commission staff may or may not have their cameras  
24 on or off. It depends on what is going on with the  
25 workshop itself. My hope is that those folks who

1 aren't actively participating, like I mentioned, if you  
2 could, leave those cameras off so that all of the  
3 active participants are a little bit bigger on the  
4 screen.

5 We're not going to mute people's microphones  
6 today, whether it be a member of the public or a  
7 participant. So we're going to ask you to  
8 self-regulate. If you're not speaking, if you could,  
9 just keep yourself on mute so, if there are any stray  
10 noises in the background, we won't pick them up. That  
11 will minimize background noises and lead to a lot less  
12 disruption.

13 In terms of people who do want to speak, I think  
14 the best way for this to happen today is for you to  
15 send me a chat message if you wish to speak, and what  
16 I'll do on my end is I'm going to keep a list of all  
17 those who wish to speak, and then, when I can get to  
18 you, I will call on you in the order that I've received  
19 those questions. For the folks who are on the  
20 telephone, I will try to remember to reach out to you  
21 and just check in to see if you have any questions. If  
22 I fail to do that, please just remind me, and we'll  
23 give you an opportunity to speak too.

24 Let me think. Oh, yes, one more thing is please,  
25 when you start to talk, make sure that each time you

1 talk you identify yourself and your organization for  
2 the court reporter.

3 So, technical issues, if your internet connection  
4 cuts out, we ask you to just wait a few moments and  
5 then try to rejoin the GoToMeeting the same way you did  
6 when you initially joined it. If you're having trouble  
7 joining via your computer, then we ask you to call in  
8 on the telephone number that was provided. If audio or  
9 video from our workshop cuts out on your end and you  
10 think it might be an issue that we're having, please  
11 let me know. Please let me know if you're able to  
12 rejoin or if you're not, and, if need be, we can pause  
13 the workshop to try and allow you to reconnect.

14 Let me think here. If, at any point, you happen  
15 to notice that another party, a participant or a member  
16 of the public, is having trouble accessing video or  
17 audio, also please send me or Elizabeth a chat, and we  
18 will try and help that person resolve their issue as  
19 well.

20 For the presenters, when you're presenting, we are  
21 going to make you the presenter in GoToMeeting. We ask  
22 that you share your slides on the screen. You'll  
23 notice there will be a little icon on your screen that  
24 says "share screen". You click on that, and your  
25 slides will pop up for everyone to see, and then, when



1 you're finished, please just click the "stop sharing  
2 screen". That way, we won't have that caught up there  
3 when we're trying to speak with one another.

4 And, finally, for those of you who have any  
5 background applications open, things like email,  
6 things, you know, Word, whatever, we do find that, when  
7 you close those out, we have better, we have better  
8 luck. We don't have any unfortunate or unwanted  
9 pop-ups that come up on the screen, and it also tends  
10 to free your computer up to use the GoToMeeting  
11 software a little bit more smoothly.

12 So before I go any further, are there any  
13 questions so far? I'm looking for texts or chat  
14 messages for anyone who has questions.

15 MR. LANDIS-MARINELLO: Mr. Gerhard, I was  
16 just going to add one clarification. If someone is  
17 sending a message saying they want to speak, just make  
18 sure there's nothing substantive in that message. It  
19 should just say, "I want to speak".

20 MS. SCHILLING: And, before we get started, I  
21 see there are two other people who have called in, and  
22 I can add their names. So, if you've called in, could  
23 you speak up and identify yourself? Sorry. I heard  
24 you were from AARP, but I couldn't hear your name.

25 MS. TAORMINA: Philene, P-H-I-L-E-N-E-,

1 Taormina, T-A-O-R-M-I-N-A.

2 MS. SCHILLING: Thanks. And the other  
3 caller? I heard Village of Hyde Park. What was your  
4 name again?

5 MS. WESCOM: Karen Wescom.

6 MS. SCHILLING: Thanks.

7 MR. GERHARD: Okay. And I do have one  
8 addendum that Mr. Costello wanted to take a moment to  
9 deal with. He needs to interview their attorney. And  
10 so, Mr. Costello.

11 MR. COSTELLO: Thank you very much. I  
12 neglected to introduce Malachi Brennan, who is sitting  
13 in for us today. Carolyn Anderson, who is the attorney  
14 of record, I believe is on vacation this week. So  
15 welcome to him. Thank you.

16 MR. GERHARD: Fantastic. I believe -- let me  
17 check my notes. I think that covers all of the  
18 procedural instructions dealing with an electronic  
19 workshop. So I think we're ready to get on to the  
20 substantive part of our discussion. So I am going to  
21 turn the floor over to GMP and the Department, and we  
22 look forward to seeing your presentation.

23 MS. BRENNAN: Thank you. This is Erin  
24 Brennan with the Department. I am happy to get us  
25 started with this if, Ms. Schilling, you could share or

1 make me the presenter.

2 MS. SCHILLING: Give me one second. You  
3 should now be the presenter.

4 MS. BRENNAN: Okay. Let's see if I can --  
5 can everyone see the title slide? I see a thumbs up.

6 MS. SCHILLING: We can see it, but it doesn't  
7 appear that this is in presenter mode.

8 MS. BRENNAN: Let me see. It is in my  
9 presenter mode. Let's see. So this is how it appears  
10 when I put it in presenter mode.

11 MS. SCHILLING: It's just, it's a little  
12 small. Is there any way to make it full screen?

13 MS. BRENNAN: It is full screen. I'm looking  
14 for -- let's see. It is definitely full screen.

15 MS. SCHILLING: Alternatively, if we can't  
16 get it full screen, everyone can zoom in on that  
17 screen. There's a plus and minus on the side, on the  
18 right side of everyone's GoToMeeting screen that they  
19 can use to zoom in.

20 MS. BRENNAN: Yeah, it doesn't say my  
21 presenter mode is on either. Here we go. Let's see if  
22 this works. Can you all see anything?

23 MS. SCHILLING: I'm just seeing a black  
24 screen. It's your desktop, it appears.

25 MS. BRENNAN: Okay. So, unfortunately, it's

1 not letting me show, it's not showing outside of this  
2 screen. Was everyone able to zoom in? Can everyone  
3 see it? Okay. I see nods, so I'm just going to go  
4 ahead and get started.

5 MS. SCHILLING: Sounds good. Thanks, Erin.

6 MS. BRENNAN: Okay. Sorry. I tried,  
7 everyone. Okay. So thank you, everyone, for joining  
8 us today. This is a workshop on Green Mountain Power's  
9 energy assistance program. We're excited to present  
10 this information with Green Mountain Power and our  
11 retained consultant, GDS. So here's the agenda for  
12 today. We will provide its very brief background and  
13 then some structure, operations, costs, and benefits of  
14 the EAP; EAP successes and opportunities; key findings  
15 from GDS's report and GMP's responses to GDS's key  
16 findings; best practices; a brief summary of GMP's  
17 lessons learned, and then we intend on opening up the  
18 floor for discussion and questions.

19 Here is some background. It's a little bit  
20 lengthy. I'm just going to touch on a few of these  
21 bullet points. So back in January of 2018, Green  
22 Mountain Power filed a petition with the Commission to  
23 return excess EAP funds to GMP customers, and, at the  
24 same time, GMP also proposed to hire an independent  
25 consultant to review the design of GMP's EAP and make

1 recommendations regarding best practices.

2 In February of that same year, the Commission not  
3 only approved the EAP, excuse me, EAP refund, but  
4 appointed the Department as the entity responsible for  
5 selecting and hiring the consultant. The Department  
6 ended up contracting with GDS Associates and, in 2019,  
7 filed GDS Associates' final report on the EAP.

8 Subsequently, in February of 2020, the Commission  
9 opened this investigation, which was then stayed due to  
10 the COVID-19 pandemic, but we are here now, so we are  
11 good to go, and I will -- I'm actually going to be the  
12 presenter for the entirety of this presentation, so it  
13 will stay up on my screen, unless the next presenter  
14 prefers otherwise.

15 MR. ANDERSON: No, that will be fine. This  
16 is Scott Anderson at Green Mountain Power. So I'll be  
17 covering the next several slides. Then we'll turn it  
18 over to Rich Hasselman, and GMP will sort of  
19 participate in that as well.

20 So this slide, as the Commission asked us to  
21 review, some of the structure, operations, costs, and  
22 benefits of the Electric Assistance Program. The goal  
23 of the EAP is to provide electric bill relief in a  
24 low-administrative-cost way coming from other GMP  
25 customers who pay a lower share of their income on

1 electricity than the low-income customers pay.

2 During the Docket 7535 proceeding, we evaluated  
3 several models, including a program that based benefit  
4 levels based on a percentage of income evaluation. GMP  
5 concluded that the Percentage of Income Plan, or PIP,  
6 would be more costly to administer than a simpler  
7 method of providing a fixed percentage discount for all  
8 eligible customers.

9 So that's what we've rolled out back in 2012,  
10 2013, and still continue today. We rolled out the  
11 program in December of 2012, so 2020 was our eighth  
12 full year of program experience. Originally, the  
13 eligibility level was established to be a statute at  
14 150 percent of the federal poverty level or below, and  
15 now we have authorization to increase the eligibility  
16 to 185 percent, which we'll discuss further. So I'll  
17 pause there before moving to the next slide. Okay. If  
18 folks want to jump in at any time with questions or  
19 comments, feel free, but, otherwise, I'll continue.

20 The current EAP provides a 25 percent discount on  
21 the total GMP electric bill, including the customer  
22 charge. Eligible customers receive 100 percent arrears  
23 forgiveness with the goal of making customers regular  
24 paying customers of more affordable bills. This has  
25 the potential to reduce GMP operational costs by not

1 having to perform disconnections, payment arrangements,  
2 and saving on disconnection notice costs.

3 Residential customers pay about 75 percent of the  
4 benefits provided while commercial customers pay about  
5 24 percent. Industrial customers pay only 1 percent of  
6 benefits. So other utilities with primarily  
7 residential customers bases could still offer  
8 meaningful benefits at a modest cost to  
9 nonparticipants. It's really residential customers and  
10 small commercial customers helping out their  
11 residential neighbors. A \$1 per month fee is about 1  
12 percent more for a typical residential customer.

13 DCF is a critical partner administering the  
14 enrollment process, as it does for other assistance  
15 programs in the state, and our participation level has  
16 hovered around \$10,000 for the last several years.

17 Next slide. Thank you. This is a depiction of  
18 the customer pathway through the EAP. There is no  
19 formal enrollment window period. Customers can enroll  
20 at any time. The process begins with general awareness  
21 of the program, which can be through GMP's customer  
22 service team or through a community action agency that  
23 may be enrolling the customer in some other assistance  
24 program. GMP's website also describes the program, and  
25 we've tried to enhance awareness of the program over

1 its life.

2 There's an application process where eligibility  
3 is verified. That's Steps 2, 3, and 4 of this process.  
4 As customers are enrolled, any arrears are adjusted to  
5 zero, and GMP moves them immediately to discounted  
6 rates. Customers remain on the discounted rates and  
7 are responsible then for all going-forward bills.  
8 They'll get notice to reenroll and must demonstrate  
9 their eligibility to remain in the program, but arrears  
10 are not adjusted after the initial forgiveness period  
11 when they first entered the program. Next slide.

12 COMMISSIONER ALLEN: Scott, this is Riley  
13 from the Commission. On the one slide prior, you  
14 referenced a number of 10,000, and I just want to be  
15 clear. Is that the number of active, yeah, active  
16 participants?

17 MR. ANDERSON: It is, yeah, and we project,  
18 you know, 30,000-plus eligible participants at the  
19 income of 150 percent or lower of the FPL, and, and  
20 we've got maybe a third or a little less than a third  
21 participating as of June 2021.

22 COMMISSIONER ALLEN: Okay, thanks.

23 MR. ANDERSON: So now it's just a few slides  
24 on the EAP structure, operations, costs, and benefits.  
25 We'll highlight some of the structural changes to the



1 program as its evolved over the years hopefully to aid  
2 any other distribution utilities that may be  
3 contemplating a program design.

4 The original program began with a 25 percent  
5 discount to the customer charge and the first 600  
6 kilowatt hours per month. We had a 3-month window for  
7 100 percent arrears forgiveness in hopes of attracting  
8 as many participants as early as possible, but then  
9 that window closed, and arrears forgiveness was not  
10 part of the program. The EAP fees were originally set  
11 50 percent higher than they are today at those levels.

12 All of these design elements were somewhat  
13 conservative, since we didn't know exactly how many  
14 eligible customers would participate. We also didn't  
15 know the magnitude of the arrears that would be  
16 forgiven. So we were trying to make sure we rolled out  
17 a program that would keep a positive fund balance  
18 without having to immediately raise the EAP fees on  
19 customers. And, as always has been the case, DCF has  
20 taken the lead in determining eligibility for us and  
21 letting GMP know who to enroll.

22 Next slide, please. So, after the 2013 program  
23 year ended, we saw that we had an overcollection in our  
24 EAP fund balance and proposed an overcollection  
25 disposition plan to the other stakeholders, namely the

1 Department and AARP. We proposed a refund of \$1.5  
2 million. We proposed to retain a million dollars for a  
3 new three-month arrearage forgiveness window and held  
4 back another million dollars to absorb growth in the  
5 program participation.

6 The refund was provided on customer bills in  
7 October of 2014. At the Commission's direction, we  
8 also started calculating interest on the EAP fund  
9 balance. After the 2014 program year ended, we still  
10 had an overcollection in our EAP fund balance and  
11 proposed another refund to customers proportional to  
12 the way it was collected from customers. So, as  
13 residential customers provided 75 percent of the  
14 funding in, they received 75 percent of the funding  
15 back to them and so on with the other customer classes.  
16 We devoted about \$450,000 to a new arrears forgiveness  
17 window for as long as the money lasted in that, in that  
18 program, and, finally, we made a structural change to  
19 the EAP fees, reducing them all by one-third to the  
20 fees that exist today.

21 Next slide. After the 2015 program year, we  
22 expanded the 25 percent discount to include all  
23 kilowatt hours, not just the first 600 kilowatt hours  
24 per month. We also felt comfortable offering an  
25 arrearage forgiveness element to new participants that

1 had no end date, and we also allowed participants to  
2 take part in GMP's Power Partners Program if they fell  
3 behind on their bills while enrolled in the program.  
4 If customers kept a payment plan for 50 percent of  
5 their arrears, the EAP fund would pay for the other 50  
6 percent at the end of the payment arrangement.

7 By 2018 we had an overcollection in the EAP fund  
8 balance, but it had not ballooned as it had in the  
9 past. Benefits were increasing due to ongoing arrears  
10 programs, participant growth, and benefit increases due  
11 to rate increases. The EAP fees remained unadjusted.  
12 We made a final refund of \$2.6 million in 2018. In  
13 hindsight, we might have been better off delaying that  
14 refund.

15 During 2019, the EAP fund balance transitioned  
16 into a deficit, and, knowing we were going to have an  
17 evaluation of the program, we didn't want to make big  
18 structural changes. The only element we eliminated at  
19 that time was the Power Partners Arrears Program to try  
20 to minimize the deficit situation. Next slide.

21 COMMISSIONER ALLEN: Scott, it looked like  
22 arrearage forgiveness occurred in 2016 and didn't  
23 sunset. So that means that there's 100 percent  
24 arrearage forgiveness today?

25 MR. ANDERSON: That is the current program

1 design. New enrollees receive 100 percent arrearage  
2 forgiveness. You don't receive forgiveness upon  
3 reenrollment.

4 COMMISSIONER ALLEN: Thanks.

5 MR. ANDERSON: Okay. The graph slide shows  
6 customer enrollment data with the bars using the  
7 left-hand scale of annual new enrollments and the line  
8 depicting average monthly new enrollments on the  
9 right-hand scale. I know it's a little small to see.  
10 We, you know, as you would expect, we see an expected  
11 early surge in participation followed by somewhat  
12 steady new enrollment each year. Obviously, customers  
13 leave the program, too, hopefully due to higher income  
14 circumstances. Next slide.

15 COMMISSIONER ALLEN: Scott? Riley again. On  
16 that prior slide, is that just enrollments; it doesn't,  
17 not account for the attrition or those that leave the  
18 program?

19 MR. ANDERSON: Yeah, that's correct. This is  
20 just a depiction of new enrollments that happen every  
21 year. So we're seeing that it just wasn't a one-time  
22 surge of customers and nobody new has enrolled. We get  
23 new enrollees every year, and we think that's an  
24 indication of customer awareness of the program on an  
25 ongoing basis.

1           COMMISSIONER ALLEN: But each year there is  
2 an attrition level. Do you know how that compares to  
3 the new enrollment?

4           MR. ANDERSON: Yeah, it's been somewhat, as I  
5 said earlier, Riley, it's been somewhat steady -- I'm  
6 sorry, Commissioner -- somewhat steady. We've, we've  
7 hovered around 10,000 customers for probably the last  
8 four or five years after growing up to that point  
9 between the start and then. Does that help?

10          COMMISSIONER ALLEN: Yeah, very much.  
11 Thanks, Scott.

12          MR. ANDERSON: So the Commission also asked  
13 us to present on the EAP's successes and challenges, so  
14 we'll take three slides to discuss that topic starting  
15 with this first one. We've had a growing EAP fund  
16 deficit since early 2019, and, when the pandemic hit,  
17 we did not wait to make major changes -- we did not  
18 want to make major changes that would affect customer  
19 bills, but, as it sits, our current EAP balance is a  
20 negative \$1.4 million. Our options are to reduce  
21 benefits or increase EAP fees. So we've got a  
22 challenge ahead of us.

23          GMP is not inclined to reduce benefits to this  
24 program that seems to be helping an important segment  
25 of our customer base. We do note that we're facing

1 some uncertainty coming off the COVID-19 disconnection  
2 moratorium. GMP's accounts receivables all over 60  
3 days stands at almost \$21 million. So our near-term  
4 focus is to get our customers arrears relief through  
5 state and federal funding while introducing any fee  
6 increases and program expansion into the early 2021  
7 timeframe. We want to focus first on getting customers  
8 stabilized and getting their arrears taken care of.

9 Next slide. With respect to the program's  
10 successes, we know we're benefiting low-income  
11 customers with lower electric bills and are encouraged  
12 by the continued steady participation. That tells us  
13 that it's worth going through the reenrollment process,  
14 the benefits are worth the trouble. It's also helpful  
15 to have this program available when customers contact  
16 us to address past-due bills. We're certainly  
17 appreciative of the willingness of our customer base to  
18 assist their neighbors in this way.

19 And just a lesson learned from the initial program  
20 rollout experience that we'll highlight in our closing  
21 slides, participation rates and arrears forgiveness  
22 amounts are two program elements that are difficult to  
23 predict. So having an overcollection in a fund balance  
24 and having to return those funds is a better problem  
25 than a perpetual deficit balance at the outset that you

1 have to deal with all the time, in our opinion, at  
2 least. We'll need to remain aware of this lesson as we  
3 propose to expand the program to newly eligible  
4 participants.

5 Next slide. So, closing out the successes and  
6 opportunities topic, we have to address a fund balance  
7 deficit of about \$1.4 million and growing today while  
8 also expanding the program to newly eligible customers.  
9 Based on information from the EAP report, we may have  
10 as many as 11,400 customers with income between 150  
11 percent and 185 percent. If the current participation  
12 rate holds for this group as well, it would mean over  
13 3,200 new participants, which equates to about \$1.2  
14 million in annual benefits or an increase of about  
15 \$100,000 per month in benefits provided, plus a  
16 potential unknown arrears component added to that.

17 The bill discounts alone for this new group of  
18 customers would require an EAP fee increase of 30  
19 percent. This is a big percentage, but it would mean  
20 moving the monthly residential fee from \$1.00 a month  
21 to \$1.30 a month. We're also open to implementing  
22 procedures to reduce the enrollment burden and are  
23 hopeful that the move to 185 percent of FPL will have a  
24 positive impact there. So I'll pause there, and we'll  
25 move over to a discussion of the report findings.

1           MR. HASSELMAN: Hi, this is Rich Hasselman  
2 with GDS. Are we transitioning over to my portion of  
3 the presentation?

4           MR. ANDERSON: Yeah, that's the intention,  
5 Rich. So why don't you go the recommendation, and then  
6 I can hit the response?

7           MR. HASSELMAN: Sounds good. So the next set  
8 of slides we have summarize key findings and  
9 recommendations that came out of the assessment that we  
10 did of the EAP. I think they highlight a number of  
11 best practices, some of the things that are working  
12 well, maybe some opportunities for improvement. So  
13 we'll step through each of these one at a time, and GMP  
14 will provide a little context around the current  
15 situation or their thoughts on it.

16           So one of the things at the very front end that we  
17 found that the EAP, that GMP's EAP was doing well was  
18 engaging with the organizations that are in touch with  
19 a lot of the at-need population. So households that  
20 are at that 150 percent or less of poverty or, you  
21 know, whether it's 185, they're in the network, and  
22 that was an important best practice that we found  
23 looking across other programs around the country and  
24 some of the recommendations.

25           So, you know, the simple recommendation there was



1 to continue to utilize the Department of Children and  
2 Families as an administrator -- they're a good hub for  
3 all this -- and the community action agencies as, as  
4 critical components of the program and also continue to  
5 engage with some of the, the broader set of  
6 organizations that bring low-income, at-need households  
7 to the program.

8 CHAIRMAN ROISMAN: Mr. Hasselman, this is  
9 Chair Roisman. I have a question for you on that very  
10 first bullet under the first recommendation. What did  
11 you find that would explain, if these organizations and  
12 GMP are doing their job, why only one-third of the  
13 eligible people are actually utilizing the program?  
14 What explains that?

15 MR. HASSELMAN: Yeah. So we'll touch on some  
16 of that in the subsequent slides, but it boils down to,  
17 to two things. So, first off, we did talk with a  
18 number of other programs, similar programs, around the  
19 country to understand that enrollment, and, to a tee,  
20 all of them talk about there are certain customers that  
21 just don't want to sign up, and that's just a, it's a  
22 cultural thing, they're not comfortable with it, you  
23 know, and, obviously, they're the ones that you never  
24 know about that don't sign up, but there can be some  
25 reluctance.

1           Probably the bigger thing, though, is the program  
2           is very well-oriented to bring people, bring households  
3           into the program who are experiencing some crisis. So,  
4           you know, they're in arrears, or perhaps they have, you  
5           know, they need food assistance or something like that,  
6           and that's what brings them into a community action  
7           agency or otherwise engaging with a broader social  
8           service network, so they're already in crisis, and not  
9           all low-income households are in that condition, so  
10          they're eligible, but they're not necessarily engaging  
11          with that network to, to get signed up. Does that  
12          answer the question?

13                   CHAIRMAN ROISMAN: Yes and no. What I'm  
14          trying to find out is, Is this program only going to  
15          really reach everybody if there's more person-to-person  
16          contact, not web contact, not mailers included in  
17          bills, but actual speaking to people on the phone or  
18          meeting them face-to-face, and, if that is needed, is  
19          that something that is being done in any program that  
20          you're aware of in order to get those people who would  
21          be willing to accept this help if they just understood  
22          what was available?

23                   MR. HASSELMAN: Yeah, the need for sort of  
24          that ongoing connection really to eligible households,  
25          finding them, talking with them, getting them signed

1 up, is something that, you know, we definitely  
2 recommend continues and expands. It is a trick,  
3 though. You don't know. Nobody goes around with a  
4 sign that says, I'm a low-income household. So you  
5 don't know who it is you need to talk to and what the  
6 right points in time are, and, you know, that's just  
7 part of the ongoing networking and, you know,  
8 marketing, if you will, that's needed. Outreach  
9 through different community organizations, communities  
10 of faith, things like that make a difference to helping  
11 bring them that in. But I would say there is no  
12 program that we've seen that, you know, is hitting what  
13 people think is, you know, like a majority of the  
14 eligible population, much less 75 or 100 percent or  
15 something like that.

16 MR. COSTELLO: This is Steve Costello. If I  
17 could address that also, Mr. Chair, one of the issues  
18 -- we will get into a little bit more of ways that we  
19 think we can try to get more people into the program in  
20 a bit, but one of the great challenges to your, to the  
21 point that you're raising in your question, we speak  
22 with customers every single day who we inform of the  
23 program and who will give a response like, Well, there  
24 are people a lot worse off than me. I don't need the  
25 help. There's others who do far worse than I. We hear

1 that kind of comment every single day.

2 There's a lot of pride and a lot of concern for  
3 others among many of the low-income people. They often  
4 are the ones most concerned for other low-income  
5 people, and it is a very difficult conversation when we  
6 know we can assist somebody and they simply will not,  
7 you know, accept the help that, that we're trying to  
8 offer. Unfortunately, that's a challenge constantly,  
9 and even with the state programs that have been  
10 created, which are going to be wonderful and have been  
11 wonderful in the pandemic, we know there's an element  
12 of customers who simply will not apply for help,  
13 because they think somebody else needs it more than  
14 they do or they just don't want to, you know, be  
15 reliant on others in any way.

16 MS. SCHILLING: If I could interject and  
17 follow up to Chair Roisman's question, in the GDS  
18 report it's stated that GMP was doing a really good job  
19 of working with the Department of Children and Families  
20 and the community action agencies but did recommend  
21 that GMP do more work with some of the other community  
22 outreach organizations. Has GMP taken any of those  
23 steps yet? Does it have plans to do more work with  
24 other community outreach organizations?

25 MR. ANDERSON: Yeah, one thing I'll just let

1 folks know, Mary Morris, who was an integral part of  
2 this program, has recently retired. So she would be  
3 here and answer that question probably better than I,  
4 but my understanding is that we have begun those  
5 initiatives to expand our outreach efforts and will  
6 continue to do so.

7 MR. COSTELLO: Yeah, absolutely, and, as we  
8 work through the new pandemic programs and try to get  
9 as many customers into those as well, we, we plan to  
10 use that process also as a, as a jumping board into the  
11 EAP for as many customers as we can convince to do  
12 that, absolutely, and working with churches and other  
13 organizations like that, and I believe we get into that  
14 a little bit more in some of the future slides.

15 MS. SCHILLING: Great, thank you.

16 MR. ANDERSON: So you can probably move on.  
17 This is Scott Anderson. You know, we, obviously, our  
18 response to this Recommendation 1 was our partnership  
19 with DCF has been excellent from our perspective, and,  
20 you know, we'll obviously work to maintain that.

21 MR. HASSELMAN: So, in terms of thinking of  
22 this, this next recommendation is really thinking about  
23 the income limitation of the 150 percent of federal  
24 poverty level, something that we identified that it's  
25 just a timing and a sequencing of when the GMP EAP

1 legislation was passed versus when, like, for example,  
2 Vermont Gas Systems's EAP was passed at different  
3 income levels.

4 And there was a misalignment between how other  
5 EAPs, but also state social services, look at what's  
6 low-income, and, in general, it's 185 percent of  
7 federal poverty level. So, quite simply, that  
8 obviously puts a ceiling on the eligibility of, for who  
9 can come into the program. We also found that it  
10 created a bit of a administrative burden, because the  
11 DCF systems were set up around that 185 percent of  
12 federal poverty level. It also creates a communication  
13 challenge with a customer who may be eligible for one,  
14 but not the GMP EAP, and so it adds some to the  
15 communication complexity.

16 So alignment of the income eligibility threshold  
17 we really see as having a number of benefits. You  
18 know, obviously, more at-need households are now  
19 eligible for the program, but also the administrative  
20 and communication challenges can get smoothed out a  
21 bit. So getting to 185 percent of federal poverty  
22 level will help improve things.

23 COMMISSIONER ALLEN: Mr. Hasselman, this is  
24 Riley Allen from the Commission. How much of a  
25 difference does that make in terms of the pool of

1 eligible customers? I think we were talking about  
2 something north of 30,000, maybe 36,000 under the old  
3 criteria, if I'm correct, and I don't know how much it  
4 is under the new criteria. Do you have --

5 MR. HASSELMAN: I think the estimate we heard  
6 just a little while ago was around 11,000 more would be  
7 eligible. I'm looking at my report right now, and  
8 we're estimating using some census data, roughly 16,000  
9 Vermont households at that level, possibly, yeah, a  
10 little over 11,000 for GMP, and that was just a pro  
11 rata share. We don't have details around the specifics  
12 of the service territory, but, in terms of overall  
13 population, it was a little over 11,000.

14 COMMISSIONER ALLEN: Thank you.

15 MR. ANDERSON: This is Scott Anderson at GMP.  
16 You're correct. We did get back those numbers from the  
17 GDS report, and it holds that the participation level  
18 is the same as we're getting from the zero to 150  
19 percent. We would expect about 3,200 more customers.  
20 So it would bring the 10,000 up to about 13,000.

21 COMMISSIONER ALLEN: Thank you.

22 MR. GERHARD: This is John Gerhard. A quick  
23 question for you. Are you -- it seems to me that  
24 there's a possibility that, as you're trying to  
25 increase the level of outreach you're doing to the 150

1 and below group and you're trying to drive that higher  
2 participation rates, now increasing the poverty level  
3 up to 180 and getting that extra 3,200 possible  
4 enrollees, I mean, are you, are you going to be able to  
5 still keep track of your progress on that first goal  
6 despite having this influx of new customers who are  
7 less fragile than the 150 and below?

8 MR. ANDERSON: Scott Anderson at GMP. That's  
9 a really interesting question. I'm not sure that  
10 that's something that we had contemplated, but, to the  
11 extent that we can track that and there's interest in  
12 tracking that, we're certainly willing to look into  
13 that. But that's a good point. We don't want to  
14 muddle the two. It would be on the, the state agencies  
15 to provide that information as, you know, we, we don't  
16 get a look at the customer's income. We just  
17 understand that they are eligible.

18 MR. HASSELMAN: Should we move on to the next  
19 one?

20 MS. SCHILLING: Oh, I have one quick question  
21 on the last slide. Elizabeth Schilling. You all may  
22 have already stated this, and I might not have caught  
23 it, because I'm trying to do the platform management  
24 thing too. If GMP were to provide assistance to  
25 ratepayers at or below 185 percent of the federal



1 poverty level, what would be the additional cost? So  
2 what would, what additional revenue would need to be  
3 raised, and how would that be distributed across GMP  
4 customers?

5 MR. ANDERSON: Sure. So this is Scott  
6 Anderson at GMP. You know, again, if we got 3,200 new  
7 customers between 150 percent and 185 percent to enroll  
8 today and started providing them benefits, it would be  
9 about \$100,000 per month in benefits or \$1.2 million  
10 per year. That would require an increase to the EAP  
11 fees for that increase in benefits alone of about 30  
12 percent. That, that doesn't incorporate any arrears  
13 forgiveness program that would come along with those  
14 new customers that would also need funding. So we're,  
15 we're facing that sort of challenge of opening this up,  
16 you know, which is what, something we obviously want to  
17 do, open it up to 185 percent and below, but it's, it's  
18 likely going to take an increase to the EAP fees to do  
19 that.

20 MS. SCHILLING: Of course, yeah. Thank you.

21 MR. HASSELMAN: So this next recommendation,  
22 finding and recommendation is related to the  
23 application process, and something we observed is  
24 there's really a single application pathway, and, while  
25 the application's certainly available in different

1 venues, you know, download from a website or  
2 distribution to, by a community group, that kind of  
3 thing, it's still a single traditional application  
4 where you print something out, fill it out, and get it  
5 to DCF, and that, and that works.

6 One of the things we learned as we were talking  
7 with other programs were some of the techniques that  
8 they use that give a few different pathways for people  
9 to apply for the program. So online applications,  
10 being able to fill something out electronically, you  
11 know, via a web portal, that kind of thing, is a way to  
12 streamline some of this and maybe open up also the, the  
13 types of entities that could help facilitate some  
14 eligible customers to apply. That's one example.  
15 Another is, you know, an online, like a customer's  
16 online account through GMP for, you know, could be  
17 another location to directly apply.

18 So what we're recommending here is to look at the  
19 avenues about other ways that customers can have a  
20 little easier time, maybe, or just, you know, you've  
21 got their attention, they can sign up right away, and  
22 in some ways, you know, keep the current application  
23 process, it's fine, but give them another opportunity  
24 to do it that maybe has a few less steps in it.

25 You know, the timing and the, the procedures then

1 for income verification and so on need to also be  
2 considered. So I don't want to take this -- this is  
3 not a light thing to necessarily consider, but opening  
4 up those pathways is another way to bring more people  
5 in. You meet them where they are when they're ready to  
6 do it, and we saw that as an opportunity.

7 MR. ANDERSON: Scott Anderson from GMP. Our  
8 response to that is, you know, general agreement. You  
9 know, we're always open to exploring these additional  
10 avenues. We do make these paper applications available  
11 to folks that we send with postage prepaid that they  
12 can mail it directly to DCF, and we obviously have  
13 applications in our offices and our links to our  
14 website.

15 Certainly, the DCF site could be, you know, it, it  
16 really is an application that a customer has to send  
17 in. If the DCF folks wanted to make that more online  
18 and automatic, that would be great. We do have some  
19 concern around linking to, directly to the DCF state  
20 software. There are some technical reasons around our  
21 reluctance to link to that at this date, but we'll  
22 continue to explore that opportunity on a going-forward  
23 basis.

24 MS. SCHILLING: Oh, wait. Before you go  
25 ahead, this is Elizabeth Schilling. So, to be clear,

1       there is no online application right now that an  
2       applicant could just submit over the internet; is that  
3       correct?

4               MR. ANDERSON:  The application is available  
5       online.

6               MS. SCHILLING:  But they can't submit it  
7       online?

8               MR. ANDERSON:  Just fill out the boxes and  
9       hit submit.

10              MS. SCHILLING:  So what are the barriers to  
11       creating an online application?  It seems like  
12       something that, you know, a lot of state entities have  
13       that kind of thing at this point.

14              MR. ANDERSON:  Well, this is a DCF website.  
15       So I think, if they wanted to make that more sort of  
16       submit your information, that would be their  
17       responsibility.  I'm not sure we have anybody from DCF  
18       here today to answer that question, what the hurdle is  
19       to get over that, but I don't think that would be a GMP  
20       enhancement.

21              MS. SCHILLING:  Okay.

22              MR. HASSELMAN:  Rich Hasselman again here.  
23       This is actually touching on what we just mentioned.  
24       One of the things we did observe, there's really two  
25       separate computer systems that, that support the

1 program. There's GMP's customer management system  
2 that's tracking the bills and, you know, where they  
3 live and are they on the program so they get the right  
4 rate, that kind of thing, and then there's the DCF  
5 system that does the income eligibility and, you know,  
6 the intake to verify eligibility, get them signed up,  
7 and then there's some exchanges between GMP and DCF to,  
8 to close the loop, but they're really very distinct  
9 systems, and there's a lot of technical challenges with  
10 trying to link those up as, you know, we just touched  
11 on earlier.

12 However, this does lead to some potential small  
13 delays in things happening or limits the pathways to  
14 potential enrollment or even just confirmation, is  
15 someone on the program or not, and I don't want to make  
16 this recommendation sound easy, but thinking about ways  
17 to try to tie some of the data systems together so  
18 that, for example, DCF can confirm account, you know,  
19 status or, you know, GMP can confirm homes, the  
20 household's been approved or is eligible very quickly  
21 through different screens is something that I think try  
22 to work toward.

23 I do really think there needs to be some care  
24 taken here with, you know, who should see what data and  
25 how is that linked and what are the data security

1 issues. We're all working in this world of IT  
2 convergence that makes a lot of people uneasy by good  
3 reason, and so I don't want this to sound like it's a,  
4 it's a simple thing to do, but we do see, if such a  
5 system can be put together with the right controls and  
6 security, there's an opportunity to potentially make  
7 the administrative operations of the program simpler,  
8 which may also help with some of that getting customers  
9 enrolled and reducing potential points of friction in  
10 the system.

11 MR. ANDERSON: Yeah, Scott Anderson at GMP.  
12 I would concur with those statements made by Rich that,  
13 you know, it's something to aspire to. We think the  
14 current separation of responsibilities, particularly as  
15 it reflects income, who has income data, should remain  
16 separate at this time, but it's something that, if we  
17 can find really great administrative efficiency gains,  
18 we would certainly be open to exploring this further,  
19 but I don't think it's anything that's going to happen  
20 at the snap of our fingers.

21 MR. HASSELMAN: Great. Rich Hasselman here  
22 again. So this next recommendation and the finding  
23 comes from just an understanding of how and when  
24 benefits are applied. It's for the, for the customer,  
25 and, at the time of the assessment, the point at which

1 a customer would start to receive benefits really to  
2 rate discount was at the point that income eligibility  
3 was verified. It's not necessarily when did they  
4 submit their application or other steps along the way,  
5 but when is that eligibility verified in the process.

6 And one of the principles in a lot of energy  
7 assistance programs is to get the benefits to the  
8 households as soon as possible, and so our  
9 recommendation here was to look at making benefits  
10 retroactive to the date of application to the degree  
11 possible, because you've got an eligible household  
12 that's at need and they've taken action, and that's  
13 really what I'd call the guiding philosophy behind this  
14 recommendation is get the benefits to, to them  
15 essentially as soon as possible, even though, in this  
16 case, it's on a retroactive basis.

17 So, again, this reflects what we saw in the  
18 process at the time, which was really tagging benefits  
19 to that eligibility, the date of eligibility  
20 verification. One approach that some utilities and  
21 programs take is allow self-certification, and that  
22 really relies on more of like an online portal and a  
23 process that lets someone sign up instantly, say, Yes,  
24 I'm eligible, they've read the rules, things like that.  
25 You can then go through and do the process after that,

1 but they're actually getting the benefits right then  
2 immediately.

3 And so, not to belabor this, but the point is get  
4 benefits to the households as soon as possible and,  
5 where needed, make it retroactive to the date they  
6 actually took action on the application.

7 MR. GERHARD: This is John Gerhard again.  
8 Just a quick question about do you know how long it  
9 usually takes a customer from the time that they apply  
10 until their information is verified and then they do  
11 start receiving benefits in the program as it's  
12 designed now, not in the future versions that you're  
13 taking about?

14 MR. HASSELMAN: Right, yeah. So, in talking  
15 with DCF, you know, this was an area to understand, and  
16 it could cause some -- there would be times of year  
17 when there was things would take a little longer than  
18 others, and in some cases it was very quick, a matter  
19 of a couple of days from the -- DCF gets an  
20 application, they've got all the data that they need,  
21 and then they can turn it around with, with GMP, and  
22 they're on.

23 Other times of the year they see surges in  
24 applications, seasonal typically, you know, entering  
25 the heating season, and that can cause some delay in



1 terms of just processing the applications through, and,  
2 you know, if a customer, also, maybe they don't provide  
3 all the information that's needed to verify  
4 eligibility, DCF has to go back and, and get them  
5 through that, and so all those little things can add  
6 some time to it.

7         So what we had heard was, you know, in, when  
8 you're outside of the, call it, the normal operations,  
9 it could be, and then application is complete, it could  
10 be done in a matter of a couple days, but it could  
11 extend to three weeks or so if you're hitting it in  
12 the, early in the heating season, and, if a customer  
13 doesn't have all the information with them right away,  
14 the application's incomplete in some way, that could  
15 extend it any amount of time, and, in fact, a customer  
16 may just not continue with the application process, so  
17 --

18                 MR. GERHARD: That was my second question,  
19 Mr. Hasselman, is, I mean, it is a problem if  
20 low-income customers are not receiving timely benefits  
21 from the program because of any kind of administrative  
22 drag, but I think, for me, the, the more important  
23 question to ask about this is, Is this a point where  
24 you're hemorrhaging customers who just get sick and  
25 tired of waiting, and so they drop out of the program

1 altogether?

2 That's a different kind of problem and a more -- I  
3 think that's a worse problem. And so do you have a  
4 sense of whether or not, at this point in the ball  
5 game, you know, is this a spot where a lot of those  
6 customers are dropping out, or is this just a very  
7 minor problem? Looking for an explanation around that  
8 question.

9 MR. HASSELMAN: Yeah, I don't think it's a  
10 huge problem of customers dropping out of the  
11 application process, but it certainly does happen. You  
12 know, the reality is there's certain information that  
13 is needed, you know, verifying, to verify income or  
14 address, and, and that can be a, create a multi-step  
15 process where, okay, I'd like to apply. Maybe I'm at a  
16 community action agency, and then the community action  
17 agency says, Okay, you need to get a pay stub or  
18 whatever the information is so that we can put that  
19 through, and those are those little steps along the way  
20 that, you know, people who are potentially in a crisis  
21 may, may drop off.

22 It's just part of that process, and, you know,  
23 this is one area where I do think self-certification is  
24 not a bad way to go is get people into the program and  
25 then sort out the details. You know, obviously,

1 there's a risk there. People who aren't eligible might  
2 sign up. The general view of other programs we've  
3 talked with is that that's not a big issue. I think,  
4 frankly, with getting to just an aligned 185 percent of  
5 federal poverty level across the board, that's going to  
6 help deal with potential accidental, you know,  
7 self-certification or people who don't understand the  
8 difference between the programs and income levels.

9 But, you know, self-certification, it gets them in  
10 the program, and you can sort it out after that. If  
11 someone is determined they're not eligible or they,  
12 they don't, you know, provide the adequate confirmation  
13 that they are eligible, you know, you do have to unwind  
14 that, and that's, that's the, that's the big risk with  
15 self-certification, quite frankly, but you do get  
16 people in the program at a faster pace as a result,  
17 because you don't put the burden at the front end. You  
18 can sort of put it to the back end.

19 MR. LANDIS-MARINELLO: Mr. Hasselman, when  
20 you were looking at all the programs in other parts of  
21 the country, did you see any that had a  
22 self-certification process that was just kind of an  
23 attestation the way, for instance, Green Mountain Power  
24 now has a rebate for electric vehicles and someone just  
25 checks a box on that form that says they attest that

1 they're below a certain income, but there's no actual  
2 follow-up in terms of finding out if there's  
3 documentation of the income being below that? And so  
4 have any programs done that because they don't see many  
5 people trying to game the system?

6 MR. HASSELMAN: Yeah, when we were talking  
7 with several programs that generally had that sort of  
8 an approach, there would be, like, a periodic check,  
9 and it might be, you know, you're going to verify  
10 someone who stays on the program is going to,  
11 everybody's going to be verified within a, say a  
12 three-year period. You're not trying to verify  
13 everybody on an ongoing basis every year for income  
14 eligibility.

15 And the, the general view is that, in doing those  
16 verifications, there's not a lot of call it, you know,  
17 incorrect enrollments. I mean, they do certainly  
18 exist, and but it's, it's viewed as it's more  
19 beneficial to get people into the program rather than  
20 risk eligible people not getting into the program, you  
21 know, so that we keep ineligible ones out of it. So  
22 that's a value judgment, but, generally, you know,  
23 verifying every two to three years seemed to be okay,  
24 and that was, by okay, that was their own way of  
25 looking at it.

1           I believe it was Eversource who had an online  
2 self-certification system that was pretty streamlined,  
3 eversource of Massachusetts we spoke with. And there  
4 they could sign up online, and they'd get access to the  
5 program. That was the one that was probably the most  
6 clear-cut case of self-certification with limited  
7 subsequent verification.

8           MR. GERHARD: Richard, let me interrupt for  
9 one sec, because I believe that Commissioner Allen may  
10 have a question.

11           COMMISSIONER ALLEN: Yeah, thanks, John. I,  
12 I didn't want to disturb the flow, and it actually kind  
13 of ties into my question, and I'm struggling with how  
14 to kind of frame it properly, but it really gets at the  
15 question of, you know, how much, you know,  
16 participation we, how much additional participation  
17 might we expect from a self-certification versus, you  
18 know, the, the current framework and whether a kind of  
19 a safeguard might be, you know, kind of a spot audit or  
20 periodic audit type of mechanism, not necessarily the  
21 Eversource paradigm of doing it everyone every three  
22 years, but just, you know, the threat of an audit might  
23 help to curtail the concern.

24           And it sounds like, from your comments if I'm  
25 taking them correctly, that the concern generally is

1 not, not material. Please correct me if I've got that  
2 wrong.

3 MR. HASSELMAN: I think that's a fair way to  
4 say it. You know, what's material and what isn't,  
5 that's a, a question always, but nobody we talked with  
6 viewed it, who really looked at sort of a little freer  
7 form of application, really viewed it as a major  
8 concern. They're much more interested in just trying  
9 to get people to sign up, because like you were talking  
10 about earlier, there's, actually, it's just challenging  
11 to do the outreach and getting all, you know, getting  
12 the eligible group of customers just to enroll.

13 So self-certification, how much might it change,  
14 you know, an online, call it an online enrollment? How  
15 much might it change? I'm going to firmly say I don't  
16 know. You know, there's already a fair amount. You  
17 know, GMP, all else equal, we estimated 25 to 30  
18 percent of the eligible population was enrolled. I, I  
19 don't know that this is really going to suddenly double  
20 it, you know? But would it go up 10 percent? 15  
21 percent? That may well be the case.

22 MR. ANDERSON: This is Scott Anderson from  
23 GMP. I think Rich has done a good job of stating the  
24 pros and cons of this issue, so I won't belabor it  
25 other than to say we do now provide the benefits

1 retroactively based on the date of application, and  
2 forgiveness happens on the next bill. So, so we don't  
3 see this as a big, real time lag from the time the  
4 customers are interested in getting these benefits to  
5 when they really get the benefits.

6 And, with respect to self-certification or instant  
7 enrollment, you know, I think Rich did touch on the  
8 notion that, you know, if the customers are found to be  
9 not eligible, then you've got to backtrack and take  
10 those benefits, claw them back, which can be  
11 particularly troublesome if you've forgiven arrears at  
12 the outset, and the report does address that, you know,  
13 it makes that recognition.

14 But I don't, I don't -- you know, if anybody has  
15 seen the application, I don't think the application is  
16 a, in my opinion, is a big barrier to entry here.  
17 It's, you know, you fill out your information, you  
18 prove income through either participation in other  
19 programs or by providing your income information, and  
20 you send it in. Yeah, so I'll stop there.

21 MR. HASSELMAN: Yeah, this is Rich again,  
22 and, you know, that's a good point. The income  
23 verification can also -- it's not just, you know,  
24 presenting a pay stub. If you're already in other  
25 programs that have, you know, income requirements and

1 the data's there, that really cuts to the chase. So I  
2 want to make it clear that that's not a burden, too big  
3 a burden. I agree that the application is not terribly  
4 arduous.

5 I think a lot of our self-certification and  
6 thinking about program application pathways is simply  
7 the how do you get, get an, someone to apply at the  
8 point, you know, where they are when they're ready, and  
9 opening that up simply would help expand enrollment.  
10 Should we move on to the next slide?

11 Okay. This next topic is something we observed in  
12 how the EAP was set up. It's a little hard to quantify  
13 this, but we saw that it was really organized around  
14 two pieces, the arrearage forgiveness and also the rate  
15 discount. You know, obviously, the household that's  
16 not in arrears would only benefit from the rate  
17 discount, right? So what we saw was that, you know,  
18 what are the trigger mechanisms that are attracting  
19 people to EAP? Who's signing up? You know, arrearage  
20 is a key component of that. That's, that triggers some  
21 of the program marketing and outreach from GMP to drive  
22 awareness.

23 You've also got a lot of the social service  
24 organizations out there, the community action agencies,  
25 DCF and others, who are working with households that



1 find themselves in one crisis or another, and so you've  
2 got different forms of crisis driving the applications  
3 to the program, and that, that, that's appropriate,  
4 right? I mean, those are people that need help and  
5 assistance but not necessarily capturing those that are  
6 eligible but not necessarily in that crisis mode. So  
7 they are low-income households that are coping. They  
8 aren't having a health crisis or something like that  
9 that's triggering outreach to the broader social  
10 service network.

11 And so looking at ways to expand outside of that  
12 and tap into really a more generalized network of, of  
13 the community is going to be important to try to  
14 capture, capture, to get eligible households not in  
15 crisis to apply. So that's a key area of potential  
16 enrollment growth, and we think it's a, it's an  
17 important one to consider.

18 CHAIRMAN ROISMAN: This is Chair Roisman  
19 again. I have a question. We've talked a lot about  
20 what might be the barrier to someone who would be  
21 eligible to actually apply and receive benefits, and  
22 I'm wondering what studies have been done of that  
23 community to find out what, from their perspective, are  
24 actually the barriers as opposed to what, from our  
25 perspective, we think are the barriers.

1           Have there been sociological studies done to find  
2           out whether or not, for example, people don't want to  
3           fill out the form because they fear that they'll be  
4           found to have put something wrong in and that will  
5           subject them to some kind of punishment? Any of that  
6           kind of study been done anywhere in the country?

7           MR. HASSELMAN: Yeah, this is Rich Hasselman  
8           again. One area that we did encounter when we were  
9           doing this research was discussion around language  
10          barriers or potential fear around immigration issues  
11          and, you know, bringing people who are maybe  
12          uncomfortable interfacing with, with government or  
13          creates risk, there may be some reluctance there that  
14          is difficult to overcome, and I think that's a fairly  
15          well-understood phenomenon.

16          In terms of the broader question around all the  
17          other households, I would have to check. That full set  
18          of information is a little outside of our research  
19          here. I would expect that, yes, that there is some  
20          good research to, to consider. I think it's going to  
21          touch on subjects other than energy assistance programs  
22          and probably reflect more about government services  
23          and, and reluctance for that.

24          MR. ANDERSON: Yeah, this is Scott Anderson  
25          at GMP. Just to put our two cents in on this topic, on

1 this slide, we focused on exploring low-cost ways to  
2 expand customer outreach and awareness of the program  
3 and have not yet really spent money to try to grow that  
4 awareness and potential enrollment.

5 MR. COSTELLO: This is Steve Costello. I'll  
6 just chime in a little to the chairman's question.  
7 Again, I think it's not sociological studies, but we,  
8 we do see so much of this issue of people who we know  
9 would be eligible from what they tell us on the phone  
10 and just don't want to apply, and it really boils down  
11 to, at least anecdotally, what we hear over and over  
12 again is, Other people need the help more than I do. I  
13 don't want to rely on others. I've never sought  
14 welfare or other state assistance. I'm not going to  
15 start now. And the hassle issue of, you know, filling  
16 out forms is, very rarely comes up. It's much more of  
17 the more personal things that we hear when we talk with  
18 customers.

19 To Scott's last point, as we look at the pandemic  
20 programs that are out there, we do plan to start, you  
21 know, once the final state program is stood up later  
22 this month hopefully, we do expect to do some, some  
23 more of a campaign, if you will, to encourage customers  
24 to take part in those programs, as well as EAP in the  
25 long run.

1           You know, we had some good success with the first  
2 pandemic program in getting customers to apply and seek  
3 that help. It is definitely challenging to get a  
4 certain segment of customers. Often those who need it  
5 most are least likely to apply in our experience. But  
6 this is something that we do plan to do on a pretty  
7 focused campaign on those programs and EAP enrollment  
8 once that last program is stood up.

9           MS. SCHILLING: This is Elizabeth Schilling.  
10 What would that campaign entail, like, what kind of  
11 outreach?

12           MR. COSTELLO: As we've noticed the board in  
13 our, in our, in the pandemic moratorium docket, it's a  
14 pretty broad plan ranging from, you know, on-bill  
15 messaging to direct letters to customers to social  
16 media work, some paid advertising, et cetera. We're  
17 still developing it, because we need to see exactly  
18 what the next program is going to be and how to explain  
19 that and how, what forms might be best to do that.

20           So more to come on that front, but we, we clearly  
21 see this -- I hate to use the word an "opportunity",  
22 but we clearly see the pandemic and the assistance  
23 that's available there as an opportunity to also inform  
24 customers about the EAP, and we expect that, that we  
25 will get some uptake as a result of the, the state

1 programs that are being stood up giving an entree to  
2 those customers who are interested in help and willing  
3 to accept it in an EAP as well.

4 MS. SCHILLING: Thanks.

5 MR. HASSELMAN: This is Rich Hasselman again.  
6 You know, one thought about this is to keep in mind  
7 households may enter and leave eligibility. A  
8 household that wasn't eligible gets into an income  
9 crisis, they address it, they go out. While there are,  
10 call it a stable population that are low-income, there  
11 are a lot of people that are, that float in and out,  
12 and that can create a real challenge with, Am I  
13 eligible? Is my situation going to change? People who  
14 aren't perhaps familiar with some of the social  
15 programs that are out there, and that really, you know,  
16 does create also, in addition to what I'd call cultural  
17 reluctance to apply for programs, a real challenge with  
18 outreach for these kinds of, these kinds of services.

19 So why don't we move on to the next slide? So  
20 this recommendation reflects on the, the current  
21 approach to arrearage forgiveness. Right now, a  
22 household applies, 100 percent of the arrears are  
23 forgiven, and, you know, they're on the, the discounted  
24 rate. One of the best practices that we saw emerge  
25 from looking at industry literature and talking to

1 other programs is to think about shaping arrearage  
2 forgiveness around trying to reinforce steady payment  
3 practices.

4 And so some programs will freeze arrears and, you  
5 know, forgive for every month of steady payment  
6 one-twelfth of the arrears until that's paid down. So,  
7 in a year of making steady payments under the  
8 discounted rate, your arrears are, are forgiven. And  
9 that's partly, you know, to give the message about, you  
10 know, your, there's a big chunk of money that's being  
11 reduced, also to help tie the, the benefit of the  
12 program over time and reinforce the benefit of the  
13 program and the awareness and also to establish that  
14 steady, stable payment, which, frankly, particularly  
15 for households in crisis, creating some level of  
16 stability and predictability frankly is of value.

17 And this is a general best practice that we saw  
18 recommended and something for GMP to consider. It's  
19 certainly not essential, and others, certainly, other  
20 programs certainly don't do that staggered forgiveness  
21 or periodic forgiveness, but it's something to think  
22 about.

23 MR. ANDERSON: Just quickly, you know, we  
24 don't disagree with, with the recommendation. You  
25 know, it's a design element that we could pursue. It

1 does add complexity. Certainly, when your arrears are  
2 forgiven at the outset, your ongoing bill is lower and,  
3 and potentially easier to keep current. So it depends  
4 on whether it's a payment arrangement or a frozen and  
5 12 months later, but it does add complexity to the  
6 program design, but we're certainly willing to explore  
7 that alternative.

8 MR. HASSELMAN: If there's no questions, we  
9 can move on to the next slide. Sorry. Rich Hasselman  
10 here again.

11 And this is an issue that does actually reach back  
12 to what we were just talking about with that arrearage  
13 forgiveness and doing it over a period of time. One  
14 thing we did observe is it's not quite clear whether  
15 the 25 percent reduction in energy charges and the  
16 customer charge is really adequate to address some of  
17 the lowest income households, their, their needs.

18 In other words, can they still keep up with making  
19 a monthly payment? And, you know, to, to then have an  
20 inadequate discount and then only sort of meter out the  
21 arrearage forgiveness doesn't really get a household  
22 anywhere. They're not going to get ahead. They're  
23 going to run back into arrears.

24 So we looked at some of the other options that are  
25 out there, and I know GMP referred earlier to having

1 explored the possibility of a percent of income  
2 payment, a PIP, and that's certainly a way to look at  
3 it. You know, Xcel Energy in Minnesota does a cap on  
4 the -- the bill can't be more than a certain percentage  
5 of a household's income. Others will scale it to, the  
6 discount, to the percent of federal poverty level. So,  
7 for example, you know, a lower percent of federal  
8 poverty level leads to a higher discount.

9 These are more complicated to maintain, and, you  
10 know, thinking about procedurally how you can, how you  
11 can keep track of all that for a household is not easy,  
12 but it's something to look at, because I do think that,  
13 for your customers that are in a more dire straits from  
14 an income standpoint, the 25 percent may not be  
15 covering it.

16 MR. ANDERSON: Yeah, Scott Anderson at GMP.  
17 I don't disagree with anything really Rich has said  
18 there, other than pointing out, you know, we've got  
19 some headwinds in front of us, and we're really trying  
20 to strike a balance here between nonparticipants'  
21 willingness to fund this program at the current levels,  
22 knowing that we've got a fund deficit and we've got an  
23 expanding program on the horizon. So increasing the  
24 discount or finding other discount, ways to provide the  
25 discount that may expand the discount, you know, we're



1 just trying to strike a balance here and also keep  
2 simplicity of program design in mind.

3 So that's where we've landed after eight years,  
4 but, as the slide notes, you know, we're, we're  
5 certainly open and willing to evaluate alternatives  
6 with other stakeholders.

7 MR. HASSELMAN: Okay. Rich Hasselman again.  
8 This is our last of the recommendations. It's a fairly  
9 straightforward one. When, you know, we looked and  
10 estimated that roughly 25 to 30 percent of the eligible  
11 population was participating, and, you know, this was  
12 just one of those questions you have to answer is, you  
13 know, Is the program already, you know, reaching a  
14 large percentage of the eligible market? And the  
15 obvious conclusion is "no". It's a significant portion  
16 of the eligible population, but it's not saturated in  
17 any way.

18 Obviously, you know, any changes we've talked  
19 about here, possible, you know, practices that might be  
20 adjusted, discount, you know, the rate discount, that  
21 kind of thing, could affect growth in program  
22 enrollments and participation, and, you know, I think  
23 we're all sort of thinking about this as we're looking  
24 at now there's a higher income threshold and, you know,  
25 dealing with the, the fund balances and, and, you know,

1     what does it cost for ratepayers as a whole for the  
2     program, that this is going to need to be something  
3     that's watched.

4             We just wanted to draw out the fact that there,  
5     there, we wouldn't say that the program has hit a  
6     ceiling in terms of what you might expect for possible  
7     enrollment, and that's just something to keep in mind.

8             COMMISSIONER ALLEN:  Mr. Hasselman, this is  
9     Commissioner Allen from the Commission.  Do you have an  
10    opinion on what is kind of a realistic, achievable  
11    level of participation for the program based upon  
12    programs you've seen in other jurisdictions?

13            MR. HASSELMAN:  Yeah.  It's going to get -- I  
14    think it's going to be tough to get it to 50 percent of  
15    the eligible population.  I think moving the needle  
16    toward a third or 40 percent of the eligible population  
17    is feasible.  I think that it's, you're, it's going to  
18    be very tricky to try to get much beyond that.  That  
19    would be a fairly, a very robust program, let's put it  
20    that way, relative to what we see out there.

21            The other, the other thing that, that is, makes it  
22    a little bit of an apples-and-oranges comparison is  
23    different programs are structured in ways that control  
24    the amount of money that's really available,  
25    and they actually cap enrollment at some level just by

1 funds being expended. There might be a linkage to  
2 low-income, the LEAP, the federal LEAP program, or the  
3 state funds, that needs to be a link there, or they  
4 will simply have a pool of money that gets drawn down  
5 until it's gone, and then, you know, enrollment is  
6 closed.

7 So it's, it's not an easy and direct comparison  
8 to, to make, but my suggestion is that getting from,  
9 you know, up to a third to 40 percent is feasible, and  
10 beyond that is going to be, be a challenge.

11 CHAIRMAN ROISMAN: This is Chair Roisman  
12 again. As you probably know, the Department ran a  
13 program and will now be running it in Phase 2 related  
14 to arrearages associated with the pandemic, and,  
15 initially, they had an \$8 million fund, and now it's a  
16 much larger fund, and they ran into a problem initially  
17 that people, because we had a moratorium on shut-offs  
18 and disconnections, people weren't applying, and so we  
19 lifted the moratorium at their request, and, sure  
20 enough, people applied, and the full \$8 million was  
21 applied for.

22 I'm wondering whether the Department has -- and  
23 I'm thinking particularly here of the CAPI people who  
24 are on the phone -- have any thoughts on whether or not  
25 these reluctances that you all have identified with

1 getting, as you said, over 50 percent of the eligible  
2 people to apply, whether they ran into that problem  
3 with that program, and, if they didn't, what was the  
4 secret sauce? What was it that managed people to be  
5 comfortable applying for and ultimately taking the  
6 entire \$8 million fund?

7 MS. FLINT: This is Carol Flint, Consumer  
8 Affairs, Public Information and Administrative Services  
9 with the Department of Public Service. Thank you,  
10 Chairman Roisman. It's a great question. We employed  
11 a very easy online application so that folks could  
12 apply from a variety of, of different types of devices.  
13 They could apply on their telephone, their smart phone,  
14 rather, or a online application by tablet or their  
15 laptop from the comfort of their home. So that, I  
16 think, was part of the secret sauce.

17 The second thing was to -- we didn't have any  
18 income eligibility requirement, so there wasn't a  
19 burden to prove anything other than to make certain  
20 self-attestations to determine the qualifying  
21 eligibility. So I think that's the self-enrollment  
22 type of practice that was discussed earlier by Mr.  
23 Hasselman and Mr. Anderson, so and maybe Mr. Costello  
24 touched on that as well.

25 So those are two, two important elements, and I

1 think we have also seen some successful enrollment with  
2 Vermont Gas services in their low-income assistance  
3 program by using an opt-out model as opposed to the GMP  
4 opt-in model. Both work with DCF to determine income  
5 eligibility. Both entities, utilities work with DCF to  
6 determine income eligibility, but they approach it in  
7 slightly different ways. So it might be useful to find  
8 out. I don't have the current statistic in terms of  
9 what the percentage enrolled versus eligible to enroll  
10 income-wise is for Vermont Gas, but it would be  
11 interesting to look at. Did I give you the answers you  
12 were looking for?

13 CHAIRMAN ROISMAN: You did. I'm going to add  
14 one extra question, because your answers were so  
15 useful, and that is, Do you have a sense of what  
16 percentage of the people who could have gotten the  
17 funds actually applied for and did get the funds?

18 MS. FLINT: Are you speaking of the Covid  
19 arrearage assistance program?

20 CHAIRMAN ROISMAN: Yes, exactly.

21 MS. FLINT: So I've looked at, well, I've  
22 looked at housing instability data that was collected  
23 by the federal government last year and continues to be  
24 updated, and housing instability was determined by  
25 surveying Vermonters. You can see state-specific data

1 or US-specific data in those surveys, and housing  
2 instability was self-certified inability to pay a  
3 mortgage or utility bills or even having to make  
4 choices between making those payments versus other  
5 essential needs that had to be met.

6 And Vermont, I mean, I'm going to speak roughly  
7 from memory, but it probably would be better if I got  
8 the current data to you, but Vermont did show that  
9 there was housing instability and surprisingly, given  
10 the, the low unemployment rates at the time that I  
11 looked at the data and that continue today. So, so the  
12 state was stressed overall, thousands of people  
13 compared to enrollment. I can't give you that. I know  
14 that then Deputy Commissioner Allen had projected, you  
15 know, that we would reach a certain number. We  
16 exceeded that number, and so we were, we were glad to  
17 achieve that.

18 We're, for the, for the ERAP program I was just  
19 looking at data for that, the Emergency Rental  
20 Assistance Program. We thought that we would see a  
21 few, you know, four to five thousand applicants based  
22 on some of the data research that I was talking about a  
23 moment ago. We have 1,700 applicants in the queue for  
24 over 2,000 different, distinct utility-type  
25 applications already.

1           So we're halfway there a month and six days into  
2           the program for a program that will last until next  
3           November, November of 2022. So it's worse than we  
4           thought. The need is worse than we thought. So and  
5           the outcome is going to be better than we expected,  
6           which means we'll burn through that money. Based on  
7           what GMP said in terms of arrearages at the beginning  
8           of this workshop, we're going to burn through the \$12  
9           million that's available for arrearage assistance  
10          that's going to be opened up within a couple of weeks.  
11          So there's a lot of need.

12                   MR. COSTELLO: Mr. Chair, this is Steve  
13          Costello. If I could piggyback on Ms. Flint's  
14          comments, I first want to say Commissioner Allen and,  
15          and Ms. Flint and others did an extraordinary job in  
16          the pandemic project program setting that program up  
17          and, and helping customers through it, and it was very  
18          successful.

19                 To your question about were the, and I'm  
20          paraphrasing, but were the folks most in need getting  
21          benefit, I think it's really difficult to say, but,  
22          again, even during that program, I can tell you that on  
23          a daily basis we spoke with customers again who we  
24          encouraged to apply for those programs, and they would  
25          not for the same reasons I mentioned earlier, that

1 somebody else needs the help more than they do and, you  
2 know, that they don't want assistance, they've never  
3 sought it before, and they're not going to seek it now.

4 So, while the program was super successful and we  
5 have every anticipation that the next program will be  
6 successful as well, it's very difficult with a certain,  
7 you know, group of customers who are in need getting  
8 them to, to accept the help, frankly. It really boils  
9 down to that for some segment of the population, and I  
10 don't know what that percentage is, but it is at least  
11 anecdotally for us a significant percentage of the  
12 at-risk and at-need population, unfortunately.

13 MR. HASSELMAN: Hi, this is Rich Hasselman  
14 again. Should we go to the slide? Great. So, really,  
15 we talked about a, frankly, a lot of the content of  
16 what's on this slide, but this is really a  
17 summarization of some best practices that we identified  
18 that we think would help to increase enrollment, and  
19 these are, you know, high-level by design, but, you  
20 know, we talked about some of the details earlier.

21 So a key thing we saw was just getting the word  
22 out more. That's how you're going to tap into the  
23 people who aren't in that state of crisis or engaged  
24 with, already engaged with DCF or community action  
25 agencies and, and the at-need populations. So that's



1 going to be a pretty key one to do to expand  
2 enrollment.

3 This touches with the second one is how to target  
4 customers in need or targeting customers in need versus  
5 customers with a delinquent balance. You know, again,  
6 arrearages is just a key trigger point for entry into  
7 the program, and the customers in need are key  
8 beneficiaries or could be. It's just that you may not  
9 see that because they're paying their utility bill but  
10 at the expense of, say, their food bill, that kind of  
11 thing, and so that's where that shift is going to be  
12 important to look at, and so, again, getting back to  
13 that outreach, tapping into the broader network will be  
14 important to do.

15 We talked a bit about applying and  
16 self-certifying. We do think opening up some pathways  
17 to getting people to being able to sign up, you know,  
18 whether it's, you know, smart phones or computers or  
19 other methods, that's a good way to expand enrollment.  
20 The next one, check the box here, this one's been done.  
21 But increasing the, the income limit to 185 percent of  
22 federal poverty level, we see that, obviously, there's  
23 more people that are now eligible, but it may also help  
24 improve some of the messaging and application and  
25 administrative process within the program.

1           So, anyway, that one has been done, and then, as  
2 we talked earlier about software efficiencies, trying  
3 to make that connection with DCF, GMP and the data  
4 flow, we see some opportunities there. Now, I want to  
5 emphasize that, you know, you start adding new ways to  
6 come into the program, new application pathways, this  
7 stuff gets complex, and it's not a, it's not a casual  
8 thing to try to design a system that will capture all  
9 those multiple changes. So, you know, looking for it  
10 incrementally, incremental improvements is not a bad  
11 way to go, but we do see some opportunities, we think,  
12 to potentially drive efficiencies there.

13           So that's the end of the presentation of my, the  
14 recommendations that we came up with, and I'm going to  
15 hand it back over to GMP.

16           MR. ANDERSON: Thanks. Scott Anderson at  
17 GMP. This last slide is directed mainly at the other  
18 distribution utilities who are participating in this  
19 workshop. Just wanted to share quickly some of the  
20 lessons we learned that you may also experience if you  
21 choose to develop your own programs. By and large, the  
22 EAP program has been successful from our perspective.  
23 It's provided benefits for low-income customers from  
24 the very beginning. Nonparticipating customers have  
25 shown a willingness to support their neighbors at these

1 fee levels.

2 We found our annual review filings to be a good  
3 opportunity to check the pulse of the program, and we  
4 welcome the periodic regulatory review as well. This  
5 is not the type of program that can just be expected to  
6 take care of itself once it's offered. We appreciate  
7 the Commission's and stakeholders' willingness as we've  
8 made changes along the way.

9 Just some further advice, be ready for fund  
10 imbalances and be ready and willing to act through  
11 refunds, benefit changes, and EAP fee adjustments.  
12 What may seem like a large overcollection at one point  
13 in time may be needed to support increased enrollment  
14 or benefit increases as rates change. So make any  
15 refunds strategically. And, finally, always be willing  
16 to explore enrollment and reenrollment efficiencies and  
17 to try to increase awareness as much as you can as the  
18 program matures. With that, I'll thank you and open it  
19 up to any discussions or questions.

20 MR. GERHARD: For anyone -- this is John  
21 Gerhard, by the way. For anyone who has questions,  
22 feel free if you'd like to just unmute yourself and ask  
23 them. If you're more comfortable sending a chat  
24 message to me so I can set up the question for you, we  
25 can do that as well. Okay. Hearing no questions, I

1 will direct your attention to the chat frame in, on the  
2 right-hand side of your go to fund me page or not go to  
3 fund me, GoToMeeting page.

4 Carol Flint has provided us with a link to some of  
5 the data that she was or that she was discussing, and  
6 then also some hard numbers are there as well. Thank  
7 you very much for joining us in this workshop. In  
8 particular, I thank the presenters, GMP and the  
9 Department. It was really helpful.

10 And what I believe we will be doing from here on  
11 out is we're going to take a look at the transcript  
12 from this workshop, and you should be hearing something  
13 from us in the form of a memo or an order coming out  
14 sometime soon to set next steps. So thank you very  
15 much, and we are going to adjourn today.

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20 (Whereupon at 3:19 p.m. the hearing was adjourned.)

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1                           C E R T I F I C A T E

2                   I, Sunnie Donath, RMR, do hereby certify that  
3 I recorded by stenographic means the Workshop Re:  
4 Investigation into the establishment of reduced rates  
5 for low-income residential ratepayers of Vermont  
6 electric utilities, via GoToMeeting video conference on  
7 July 8, 2021, beginning at 1:30 p.m.

8           I further certify that the foregoing testimony was  
9 taken by me stenographically and thereafter reduced to  
10 typewriting and the foregoing 68 pages are a transcript  
11 of the stenographic notes taken by me of the evidence  
12 and the proceedings to the best of my ability.

13           I further certify that I am not related to any of  
14 the parties thereto or their counsel, and I am in no  
15 way interested in the outcome of said cause.

16           Dated at Westminster, Vermont, this 9th day of  
17 July, 2021.

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19   //Sunnie Donath, RMR

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