



January 5, 2022

Holly R. Anderson  
Clerk of the Commission  
112 State Street  
Montpelier, VT 05620-2701

Re: Case No. 20-0203-INV: Investigation into the establishment of reduced rates for low-income residential ratepayers of Vermont electric utilities

Dear Ms. Anderson,

Burlington Electric Department (“BED”) submits the following comments in response to the questions presented by the Public Utility Commission (“Commission”) in its September 28, 2021, Order Requesting Information in this case. BED’s responses are provided after each Commission question below.

*1. What are the utilities’ and other stakeholders’ views on creating a statewide funding mechanism to fund low-income bill assistance for all utility customers?*

While BED is interested in participating in any discussion of a statewide funding mechanism for low-income bill assistance in this proceeding, BED questions whether such a mechanism could be implemented without increasing costs for non-qualifying ratepayers through a purely Commission process. BED reiterates its comment from its June 1, 2021, comments in this case that no customer class in Vermont is well positioned to incur additional charges at this time, due to the widespread impacts of the COVID19 pandemic. Further, it is imperative to keep electric rates as low as possible to incentivize customer implementation of beneficial electrification measures as a primary tool for meeting Vermont’s climate goals.

*2. How could such an approach be executed under the current legal framework of 30 V.S.A. § 218(e), which provides that “the Commission . . . may issue an order approving a rate schedule, tariff, agreement, contract, or settlement that provides reduced rates for low-income electric utility consumers”?*

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It is unclear to BED whether the legislative intent of the above 30 V.S.A. § 218(e) provision included authorizing the Commission to implement a new statewide rate program in addition to authorizing the Commission to review and approve utility-proposed rates, schedule, tariffs, agreements and contracts. Questions as to the scope of the legislative intent of this provision may be best resolved in legislative discussions.

*3. What alternative ideas, if any, do the utilities have to extend electric bill assistance to low-income customers of all Vermont utilities while also addressing the concerns of some utilities regarding individually funding their own low-income programs because of the high percentage of low-income customers in their service territories?*

BED notes that it currently offers a low-income bill credit program that was put into place in conjunction with BED's recent rate increase to help offset the rate increase impacts on BED's most economically vulnerable customers. This program is funded by federal American Rescue Plan Act of 2021("ARPA") funds appropriated to the City of Burlington and will conclude on June 30, 2022. In order to continue providing assistance to qualifying BED customers, BED is considering implementation of its own low-income assistance rate program as of the 2023 fiscal year beginning July 1, 2022, using the Standards and Procedures for Rate Changes for Municipal and Cooperative Electric Utilities that were authorized in Vermont Act 13 of 2021 and approved by the Commission in its October 18, 2021, Order. At this time, BED does not have additional ideas for providing electric bill assistance to low-income customers of all Vermont utilities.

Thank you for the opportunity to provide comments. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,



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Burlington Electric Department  
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