



VILLAGE OF HYDE PARK

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January 7, 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,

Hyde Park Electric Department (HPE) offers the following comments on the topics outlined in the Commission's 9/28/21 Order Requesting Information.

COMMISSION QUESTIONS

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?*

HPE supports a statewide funding mechanism that will work directly with low income customers to provide financial assistance according to their individual needs, provided that the mechanism does not result in additional expense to low-income, elderly or middle-income customers. An on-bill charge applied to low income, elderly and middle-income customers will add to their financial burden. HPE believes that these customers should not be required to pay this charge. Further, identifying, qualifying, activating and administering an on-bill charge increases utility expenses shared by elderly, low-income and middle-income customers. HPE believes that a mechanism that mitigates expense to all ratepayers while supporting low-income customers is the best alternative. HPE does not believe that the Green Mountain Power's Energy Assistance Program can be effectively utilized by smaller utilities. HPE believes that there are alternatives for consideration.

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 rateschedule, tariff,*

agreement, contract, or settlement that provides reduced rates for low- income electric utility consumers”?

HPE has no comment.

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?*

HPE offers several alternatives for consideration:

- An on-bill fee applied only to large commercial/industrial customers
- Utilizing federal funds and/or state general funds
- An on-bill voluntary contribution
- A combination of all the above.

HPE works to meet RES standards and promote equity. Our Hyde Park Solar, Waterhouse Project provide equal benefits all customers. The HPE pilot project, Community Solar Rider Tariff was the first phase of providing a way for lower-income residential customers to participate in the benefits offered others by net-metering. Development of a solar array to support the Community Solar Rider Tariff is currently stalled due to the amount of net-metering on our system.

We appreciate the opportunity to offer comments and alternatives for consideration. Thank you for working to support our customers. Please let me know if I can be of further assistance.

Sincerely,

Carol Robertson

Carol Robertson

General Manager

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