

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-3563-PET

Petition of the Town of Stowe Electric Department for approval of its 2020 Integrated Resource Plan	
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Order entered: 03/02/2022

**FINAL ORDER APPROVING THE TOWN OF STOWE ELECTRIC DEPARTMENT'S INTEGRATED
RESOURCE PLAN**

In today's Order, the Vermont Public Utility Commission ("Commission") adopts the conclusions and recommendations in the Hearing Officer's proposal for decision.

PROPOSAL FOR DECISION

This proceeding concerns the 2020 least-cost Integrated Resource Plan ("2020 IRP") filed by the Town of Stowe Electric Department ("Stowe Electric") on November 24, 2020, for approval by the Commission pursuant to 30 V.S.A. § 218c. In this proposal for decision, I recommend that the Commission approve the IRP, subject to conditions. I also recommend that the Commission accept the Memorandum of Understanding ("MOU") between Stowe Electric and the Vermont Department of Public Service ("Department") filed on June 22, 2021.

I. PROCEDURAL HISTORY

On November 24, 2020, Stowe Electric filed a petition for approval of the IRP pursuant to 30 V.S.A. § 218c.

On December 1, 2020, Attorney Michael J. Hall, Esq. filed a motion to represent Stowe Electric *pro hac vice*.

On February 16, 2021, the Hearing Officer held a scheduling conference.¹

On March 3, 2021, the Hearing Officer issued a scheduling conference order and granted Attorney Hall's motion to represent Stowe Electric *pro hac vice*.

On May 25, 2021, the Department filed initial comments on the IRP.

¹ John Gerhard, Esq., was appointed the hearing officer in this proceeding. However, Mr. Gerhard has since left the Commission, and I was assigned to act as hearing officer following his departure.

On June 22, 2021, the Department and Stowe Electric filed their MOU. The Department also filed testimony in support of the MOU.

No other comments on the MOU or IRP were filed with the Commission.

No party requested an evidentiary hearing or objected to the prefiled testimony and exhibits. Accordingly, I admit the following prefiled testimony and exhibits as if presented at a hearing: the Stowe Electric 2020 IRP (“IRP”) filed on November 24, 2020; the MOU between Stowe Electric and the Department filed on June 22, 2021; and the prefiled testimony of Claire McIlvennie, Department (“McIlvennie pf.”).

II. FINDINGS

GENERAL

Pursuant to 30 V.S.A. § 8(c), and based on the record and evidence before me, I present the following proposed findings of fact to the Commission.

1. Stowe Electric is an enterprise division of the Town of Stowe with a service territory that encompasses approximately 63 square miles entirely within the town of Stowe. IRP at 10 and 94.

2. Stowe Electric currently serves approximately 3,500 residential customers and 800 commercial customers, including the Stowe Mountain Resort (“Mountain”). Commercial customers account for approximately 58% of Stowe Electric’s retail sales; residential customers account for approximately 32% of sales; and the Mountain accounts for the remaining approximately 10% of sales. IRP at 16, 28, and 94.

3. Stowe Electric is a winter-peaking utility with significant load variation in the winter months that is largely attributable to winter tourism and snow-making operations at the Mountain. IRP at 16.

4. Stowe Electric provides service to the Mountain subject to the terms of an interruptible tariff that enables Stowe Electric to pass costs related to the Mountain’s intermittent snowmaking operations directly to the Mountain subject to the terms of a load-following contract. IRP at 3 and 92.

2020 IRP

5. The 2020 IRP is Stowe Electric's planning document for the 2020 to 2040 timeframe. The IRP is a tool that is intended to optimize Stowe Electric's generation portfolio with a cost structure that stabilizes rates and improves financial health, services, and environmental indicators for the utility and its customers. IRP at 2.

6. The IRP includes historical and background information on the Town of Stowe and Stowe Electric; current demographic data for the Town of Stowe; a detailed overview of Stowe Electric's current power supply portfolio and electricity demand; future load forecasts and demand projections; an assessment of the environmental impact of generation resources in Stowe Electric's current and forecasted portfolios; an analysis of Vermont's statutory Renewable Energy Standard ("RES"); and an assessment of Stowe Electric's transmission and distribution system. IRP at 2.

7. Stowe Electric consulted with Energy New England, LLC ("ENE") and ITRON, Inc. ("ITRON") to develop the underlying models and data that support the IRP. ITRON developed a twenty-year energy and demand forecast, which was subsequently analyzed by Stowe Electric and ENE to develop and inform the conclusions that are included in the IRP. IRP at 2 and 16.

8. To develop its twenty-year load forecast, Stowe Electric first developed a baseline forecast that includes separate models for its residential, commercial, and Mountain customer classes. The baseline forecast data for each customer class was aggregated and then adjusted to account for the following factors: disruptions caused by the COVID-19 pandemic, expected behind-the-meter solar generation, increased cold-climate heat pump usage, projections for electric vehicle adoption and use, and projections for broader climate and economic trends. IRP at 16–44.

9. For the 2020 through 2040 timeframe, the aggregated baseline demand forecast projects an average annual growth rate of 0.3% for net load and 0.1% for peak demand. When adjusted for behind-the-meter solar generation, cold-climate heat pumps, and electric vehicle adoption, the forecast values increase to an average annual growth of 0.9% for net load and 0.8% for peak demand. IRP at 17, 20, and 32–34.

10. The IRP includes a description of Stowe Electric's existing power supply resource mix, which includes an 80% carbon free generation portfolio. Stowe Electric's portfolio consists

of a mix power purchase agreements (“PPAs”) with Hydro Quebec, Next Era Nuclear (Seabrook), the J.C. McNeil Station, the New York Power Authority’s (“NYPA”) St. Lawrence and Niagara facilities, Ryegate, the Stony Brook Combined Cycle facility, and Saddleback Wind that are supplemented by standard-offer purchase obligations, the output from the Nebraska Valley Solar Farm (1 MW) owned by Stowe Electric, and market purchases. IRP at 3 and 75–83.

11. In 2019, Stowe Electric’s energy supply mix consisted of the following resources by percentage: 30.7% hydroelectric, 23% nuclear, 2.8% wind, 11.2% wood/biomass, 1.5% solar, 2.1% mixed renewables, 0.9% oil and gas, 8.6% other contract purchases, and 19.8% market purchases. IRP at 76.

12. Stowe Electric will be able to satisfy approximately 57% of its ISO New England Forward Capacity Market (“FCM”) obligations through 2024 with existing capacity resources. The IRP forecasts Stowe Electric’s future FCM costs and obligations through 2040 and includes an evaluation of several alternative approaches for satisfying the projected capacity obligations, including bilateral contracts and future market purchases. IRP at 83–85.

13. The future energy resource decisions evaluated in the IRP are informed by the RES, which establishes renewable energy requirements for Vermont’s electric distribution utilities (referred to as Tier I, Tier II, and Tier III requirements). IRP at 86–91.

14. Stowe Electric satisfies its current RES Tier I obligations by retiring renewable energy credits (“RECs”) from existing generation resources including Hydro Quebec and the NYPA facilities. Stowe Electric intends to continue this approach for Tier I compliance, but will also evaluate other REC purchasing opportunities and potentially engage in “REC arbitrage”² to reduce RES compliance costs where feasible.

15. Stowe Electric satisfies approximately 107% of its current RES Tier II requirements through its existing distributed generation resource portfolio, which mostly consists of output from the 1 MW Nebraska Valley Solar project. Stowe Electric plans to meet future Tier II obligations with banked RECs through 2022 and then rely on a mix of existing distributed generation resources, purchased RECs, and new distributed generation projects. IRP at 87.

² REC arbitrage can be accomplished by opportunistically trading RECs within other jurisdictions that have differing compliance tiers and requirements for renewable energy purchases.

16. The IRP includes projections and analysis for Stowe Electric's ongoing RES Tier III compliance. Currently, there are 16 public electric vehicle charging stations throughout Stowe Electric's service territory. Stowe Electric intends to increase the number of charging stations in its service territory as demand for charging increases over the term of the IRP. Stowe Electric also plans to achieve future Tier III compliance, in part, through collaborations with Efficiency Vermont that are directed at improving residential weatherization, industrial process fuel efficiency, increased use of biofuels, biomass heating systems, electric vehicles or related infrastructure, and storage. IRP at 63–66, 89 and 116.

17. To evaluate future energy and capacity portfolio options, Stowe Electric developed a simulation model that evaluated nine different portfolio scenarios with varying amounts of resources, fuel types, and the potential renewal of existing contracts. The model, which also factors RES compliance, locational marginal prices (“LMPs”), and Stowe Electric's hedged positions, was designed to assess the net-present value (“NPV”) and trade-offs of each of the nine scenarios. IRP at 116.

18. The IRP identifies an optimal portfolio scenario for Stowe Electric's projected load through 2040 (based on balancing NPV, RES compliance, and hedged demand) that includes: (1) Stowe Electric's current portfolio, (2) the addition of a new 100 kW hydroelectric generation unit to be owned by Stowe Electric, (3) the extension of an existing hydroelectric PPA that accounts for approximately 3% of load, (4) a new PPA for hydroelectric generation that would account for 2.5% of load, (5) an extension of the existing PPA with Saddleback Wind, (6) an extension of the Hydro Quebec PPA, and (7) the addition of 5 MW of Vermont-based solar generation. IRP at 117 and 119–120.

19. The IRP contains an evaluation of Stowe Electric's transmission and distribution system, including a description of the current system configuration, past upgrades, performance standards, and grid modernization efforts. IRP at 94–106.

20. The IRP also includes information on Stowe Electric's residential time-of-use (“TOU”) rate, which includes a critical peak pricing component. The TOU rate was implemented after Stowe Electric installed advanced metering infrastructure and completed a cost-of-service study in 2015. IRP at 92–93.

21. The IRP describes Stowe Electric's vegetation management program, procedures for responding to severe weather events, emergencies, outages, and general reliability efforts. IRP at 108–113.

22. The IRP includes an action plan for implementing the conclusions and objectives identified in the IRP, which are directed at implementing the optimal portfolio standard identified in the IRP. IRP at 122.

23. In its next IRP, Stowe Electric plans to use the recommendations in the Vermont Comprehensive Energy Plan and guidance from the Department when setting a path to help Vermont meet its energy goals, including those contained in the RES. IRP at 123.

MOU

24. Stowe Electric and the Department agree that the IRP should be approved by the Commission, pursuant to 30 V.S.A. § 218c. MOU ¶ 1; McIlvennie pf. at 3.

25. Stowe Electric and the Department agree that the IRP is consistent with the State's Comprehensive Energy Plan. MOU ¶ 2.

26. Stowe Electric and the Department agree that approval of the IRP will constitute approval of the decision-making process described in the IRP only and will not constitute approval of any of the specific decision-making tools, analytical methods, or outcomes described in the IRP. MOU ¶ 4.

27. In the MOU, Stowe Electric and the Department have agreed that Stowe Electric will file its next regularly scheduled IRP on or before November 24, 2023, and have also agreed to the following procedures for the next IRP:

- a. Stowe Electric will engage the Department, beginning at least six months prior to the IRP filing deadline, to discuss IRP methods, contents, and to share drafts. Stowe Electric and the Department recognize that timely prefiling engagement by all parties can expedite preparation of the plan and contribute to the Department's timely review of the IRP.
- b. Stowe Electric's next IRP will include an analysis of anticipated distribution-level impacts of electrification of transportation and heating, taking into account a number of factors including historic deployment patterns, forecasts of heat pump and electric vehicle deployment, and physical limits of distribution system

infrastructure, as appropriate and available. Stowe Electric will assess strategies to manage these new loads to minimize integration challenges and costs in its next IRP.

- c. Stowe Electric will perform a quantitative analysis of strategies for peak shaving, including but not limited to active load management, utilization of storage and other distributed energy resources, and rate design (e.g. opportunities to base demand charges on coincident peaks, as appropriate) for inclusion in its next IRP.
- d. Stowe Electric will include a discussion of system resilience (cyber and physical), including any anticipated resilience-focused investments (and proposed metrics for measuring the impact of those investments) in its next IRP.
- e. Stowe Electric will work with the Department to update annual vegetation management targets, Stowe Electric's vegetation treatment reporting table, and to implement procedures to track actual mileage treated by contract vegetation management crews.

MOU ¶ 3; McIlvennie pf. at 3–4.

III. DISCUSSION

Section 218c of Title 30 of the Vermont Statutes Annotated sets out the statutory standards that the IRP must meet.³ The statute provides that the Commission may approve a company's least-cost plan if it complies with the requirements of Section 218c(a)(1) and 30 V.S.A. §§ 8004 and 8005 (the RES) and is consistent with the Comprehensive Energy Plan issued under 30 V.S.A. § 202(b). In reviewing the IRP and the MOU, I conclude that the IRP addresses the statutory standards outlined in 30 V.S.A. § 218c and will promote the general good of the State. Accordingly, I recommend that the Commission approve the IRP and accept the MOU.

³ Section 218c(a)(1) defines a least-cost integrated resource plan as “a plan for meeting the public's need for energy services, after safety concerns are addressed, at the lowest possible present value life cycle cost, including environmental and economic costs, through a strategy combining investments and expenditures on energy supply, transmission, and distribution capacity, transmission and distribution efficiency, and comprehensive energy efficiency programs. Economic costs shall be assessed with due regard to:

- (A) the greenhouse gas inventory developed under the provisions of 10 V.S.A. § 582;
- (B) the State's progress in meeting its greenhouse gas reduction goals;
- (C) the value of the financial risks associated with greenhouse gas emissions from various power sources; and
- (D) consistency with section 8001 (renewable energy goals) of this title.

Although the statute establishes a standard for the review of IRPs, it does not specify what Commission approval of an IRP means. The Commission's overarching goal in reviewing and approving IRPs is to ensure that utilities are engaging in an appropriate process to address the planning components defined by statute. Regarding the details specific to each IRP, the Commission principally relies on the expertise and analytical work of the Department in reviewing the IRP. Therefore, consistent with previous Commission decisions and as stipulated by Stowe Electric and the Department, I recommend that the Commission determine that approval of the IRP extends to the decision-making processes included in the IRP, but not to the specific decision-making tools, analytical methods, or outcomes described in the IRP.⁴

Stowe Electric and the Department have agreed to provisions regarding Stowe Electric's next IRP, as explicitly recited in the MOU and stated in the findings above. The MOU contains topics to be explored in Stowe Electric's next IRP, including distribution-level impacts of transportation and heating electrification, strategies for managing new loads and peak shaving, and requirements for engagement with the Department before Stowe Electric files its next IRP. I recommend that the Commission include compliance with the MOU as a condition of its approval of the IRP, based on the agreement of Stowe Electric and the Department and because these measures will enhance the way future IRPs address the statutory requirements of 30 V.S.A. § 218c.

Finally, utilities are required to file IRPs at least every three years. I recommend that the Commission establish November 24, 2023, (three years from the date that the IRP was originally filed) as the deadline for filing Stowe Electric's next IRP.

IV. CONCLUSION

In this proposal for decision, I recommend that the Commission approve the IRP filed by Stowe Electric on November 24, 2020, and accept the MOU signed by Stowe Electric and the Department that was filed on June 22, 2021.

In the MOU, Stowe Electric and the Department waived their rights to file comments on a proposal for decision in this proceeding if it was consistent in all material respects with the

⁴ See e.g., Docket 7319, Order of 3/6/08 at 6; Docket 6895, Order of 7/13/06 at 8.

MOU.⁵ I have not circulated this proposal for decision to the parties pursuant to 3 V.S.A. § 811 because it is consistent in all material respects with the MOU and it is not adverse to any party.

Date: March 2, 2022

A handwritten signature in blue ink, appearing to read "D-CB", written over a horizontal line.

Daniel Burke, Esq.
Hearing Officer

⁵ MOU ¶ 7.

V. COMMISSION DISCUSSION

The role of the IRP has evolved over time to reflect contemporaneous challenges and opportunities facing utilities. In the past, important questions in IRPs related to power supply and resource decisions, including portfolio choices and commitments to energy efficiency. Many of those resource choices remain relevant today, but new ones are emerging that deserve greater attention in future IRPs. The Commission sees the IRP as instrumental in helping to plan for change and encourages utilities to make their IRPs relevant to the current and emerging questions they face.

Planning for distributed energy resources is critical. Vermont utilities are already confronting the challenges and opportunities presented by distributed energy resources, including solar PV and storage systems. These resources may provide lower-cost forms of generation, enhanced system resilience, and cleaner sources of electricity over time, but in the near term they also risk adding costs to the system. Innovative compensation frameworks, combined with dynamic controls, can help alleviate that cost risk. IRPs can be instrumental in guiding and shaping that evolution. IRP distribution system planning can also set the framework for the addition of these resources at lower total cost.

Beneficial electrification is another important issue in utility planning. In the coming decade and beyond, beneficial electrification in transportation and heating is expected to drive significant changes to the grid, power supply, and cost drivers for utilities. This will create both risks and opportunities for utilities and their customers.

New loads will have an impact on Stowe Electric's system. In this IRP, Stowe Electric has forecast increasing loads in heating and transportation. Over the long term, new loads, if left largely uncontrolled, seem likely to require upgrades to the distribution grid, drive up power supply costs, and change the financial dynamics for Stowe Electric. However, with effective planning and implementation, utilities can manage these cost pressures for better financial performance and improved customer experience.

Utilities that modernize their grids, implement two-way communications directly with distributed energy resources, direct loads away from peak times using rate structures and load control, and coordinate new loads with local distributed generation will be in a much stronger

financial position than those that fail to plan for the future of the grid. In this IRP, Stowe Electric has begun to consider these issues by considering its existing residential TOU rate, storage, and continuing to assess grid modernization efforts.


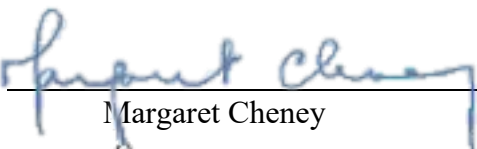
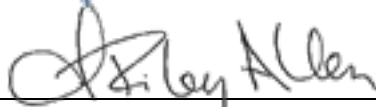
The Commission looks forward to seeing an evolution of planning efforts in Stowe Electric's 2023 IRP. We expect that Stowe Electric will strengthen its consideration of the impact of beneficial electrification on peak-related power supply and distribution system costs, will analyze the potential implementation of technologies and rate structures to manage new loads, and will develop investment priorities for the future grid.

VI. ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Vermont Public Utility Commission ("Commission") that:

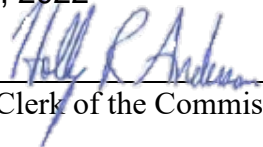
1. The findings and conclusions of the Hearing Officer are adopted.
2. The Integrated Resource Plan ("IRP") filed by the the Town of Stowe Electric Department ("Stowe Electric") on November 24, 2020, is approved.
3. The attached Memorandum of Understanding ("MOU"), signed by Stowe Electric and the Vermont Department of Public Service and filed on June 22, 2021, is accepted, and Stowe Electric shall comply with all provisions of the MOU.
4. Stowe Electric's next IRP shall be filed no later than November 24, 2023.
5. This case is closed.

Dated at Montpelier, Vermont, this 2nd day of March, 2022.

 _____)) PUBLIC UTILITY))
Anthony Z. Roisman)	
_____)	
 _____)) COMMISSION))
Margaret Cheney)	
_____)	
 _____)) OF VERMONT)
J. Riley Allen)	

OFFICE OF THE CLERK

Filed: March 2, 2022

Attest: 

 Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-3563-PET

Petition of the Town of Stowe Electric Department
for approval of its 2020 Integrated Resource Plan

MEMORANDUM OF UNDERSTANDING

WHEREAS, on November 24, 2020, the Town of Stowe Electric Department ("SED") filed its 2020 Integrated Resource Plan ("IRP") with the Vermont Public Utility Commission ("Commission" or "PUC") seeking its approval pursuant to 30 V.S.A. § 218c;

WHEREAS, SED and the Department of Public Service ("Department") have engaged in discussions and negotiations regarding the content of SED's 2020 IRP;

NOW THEREFORE, in consideration of the mutual promises and representations contained herein, the parties agree and stipulate as follows:

TERMS AND CONDITIONS

1. The parties agree that SED's 2020 IRP filed in ePUC on November 24, 2020 should be approved by the Commission pursuant to 30 V.S.A. § 218c(b) in that it describes a decision-making process that is likely to meet the public's need for energy services at the lowest present value life cycle cost, including environmental and economic costs, through a strategy combining investments and expenditures on energy supply, transmission and distribution capacity, transmission and distribution efficiency, and comprehensive energy efficiency programs.
2. SED's 2020 IRP was found to be consistent with the State's Comprehensive Energy Plan.
3. SED will file its next regularly scheduled IRP on or before November 24, 2023. In connection with the preparation of its next IRP, SED agrees as follows:
 - a. SED will engage the Department, beginning at least six months prior to the IRP filing deadline, to discuss IRP methods, contents, and to share drafts. SED and the Department recognize that timely pre-filing engagement by all parties can expedite preparation of the plan and contribute to the Department's timely review of the IRP.
 - b. SED's next IRP will include an analysis of anticipated distribution-level impacts of electrification of transportation and heating, taking into account a number of factors including historic deployment patterns, forecasts of heat pump and electric vehicle deployment, and physical limits of distribution system infrastructure, as appropriate and available. SED will assess strategies to manage these new loads to minimize integration challenges and costs in its next IRP.
 - c. SED will perform a quantitative analysis of strategies for peak shaving, including but not limited to active load management, utilization of storage and other distributed energy

- resources, and rate design (e.g., opportunities to base demand charges on coincident peaks, as appropriate) for inclusion in its next IRP.
- d. SED will include a discussion of system resilience (cyber and physical), including any anticipated resilience-focused investments (and proposed metrics for measuring impact of those investments) in its next IRP.
 - e. SED will work with the Department to update annual vegetation management targets, SED's vegetation treatment reporting table, and to implement procedures to track actual mileage treated by contract vegetation management crews.
4. The Department and SED agree that approval of the proposed IRP shall constitute approval of the decision-making process described in the IRP only and shall not constitute approval of any of the specific decision-making tools, analytic methods, or outcomes describes in the proposed IRP.
 5. The Department and SED agree that approval of the proposed IRP shall not relieve SED of its ongoing duty to:
 - a. monitor key uncertainties and the continued accuracy of assumptions and data in the IRP;
 - b. continue to reevaluate the merits of the decision-making processes, including the methods used, and to adopt such processes to new techniques or information; and
 - c. continue to reevaluate the merits of the strategies identified in the IRP as new information becomes available.
 6. The stipulating parties have made compromises in order to reach this MOU. Accordingly, by agreement of the stipulating parties, this MOU shall not be construed by any party or tribunal as having precedential impact on any future proceedings involving the parties, except as necessary to implement this MOU or to enforce an order of the Commission resulting from this MOU. The stipulating parties reserve the right in future proceedings to advocate positions that differ from the positions set forth in this MOU, and this MOU may not in any future proceeding be used against any undersigned party, except for enforcement of this MOU or the Commission's Order adopting this MOU.
 7. The parties, in accordance with 3 V.S.A. § 811, hereby waive the opportunity to file exceptions and present briefs and oral arguments with respect to a proposal for decision to be issued in this case, provided that the proposal for decision is consistent in all material respects with this MOU.
 8. This MOU is expressly conditioned upon the Commission's acceptance of all its provisions, without material change or condition. In the event the Commission fails to approve this MOU in its entirety or acts to overrule or disapprove any portion hereof, each such party agrees that their agreement set forth herein may terminate, if such party so determines in its sole discretion, and each shall have the same rights as each would have had absent this MOU. In the event any


material modification or condition is made to the MOU, and a party exercises its option referenced above, each party hereto shall be placed in the position that it enjoyed in this proceeding before entering this MOU.

9. This MOU may be executed in multiple counterparts, which together shall constitute one agreement.
10. This MOU is governed by Vermont law and any disputes under this MOU shall be decided by the Commission.
11. The Department will support issuance of the orders and findings of the Commission specified herein subject to the Department's obligations under Title 30 of the Vermont Statutes Annotated.

DATED at Montpelier, Vermont this 22nd day of June 2021.

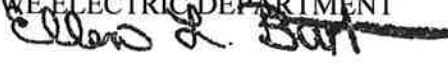
Respectfully submitted,

VERMONT DEPARTMENT OF PUBLIC SERVICE

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STOWE ELECTRIC DEPARTMENT


By: _____

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PUC Case No. 20-3563-PET - SERVICE LIST

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