



June 10, 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 April 26, 2022, Order Clarifying the Scope of This Proceeding and Requesting Information in this case. BED’s responses are provided after each Commission question below.

1. An estimate of the number of low-income customers (185 percent of federal poverty level) in the utility’s service territory.

To calculate this number, BED used a regression function fit to the income distribution of Burlington derived from the household income in the past 12 months as reported in the 2020 US Census.¹ This enabled us to estimate the share of residential households on a continuous income basis. BED applied an income threshold of 185% of the Federal Poverty Level (“FPL”) with the City of Burlington’s average household size of 2.2 people² against the results of the regression analysis to estimate the number of households at or below this threshold. This resulted in 6,224 of BED’s 17,478 residential customers being at or below 185% of the FPL.

¹ 2020 US Census, Burlington; VT Household Income Distribution in the past 12 months:

https://data.census.gov/cedsci/table?t=Income%20%28Households,%20Families,%20Individuals%29%3AIncome%20and%20Earnings%3AIncome%20and%20Poverty&g=0100000US_1600000US5010675&tid=ACSDT5Y2020.B19001.

² 2020 US Census Burlington; VT person per household: <https://www.census.gov/quickfacts/burlingtoncityvermont>

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2. The end-of-year customer counts by class (residential, commercial industrial), annual revenues by class, and annual kWh consumption by class, along with totals for the utility from 2017 through 2021.

	2017	2018	2019	2020	2021
Customer Count					
Residential	16,957	17,096	17,260	17,348	17,350
Commercial	3,057	3,054	3,045	3,130	3,095
Industrial	820	855	882	895	919
Total Customers	20,834	21,005	21,187	21,373	21,364
Revenues					
Residential	12,588,803	13,357,732	12,947,145	13,888,394	14,352,640
Commercial	3,234,623	3,205,855	3,087,186	2,745,303	2,892,872
Industrial	30,523,382	30,211,817	29,137,037	26,785,526	28,443,274
Total Revenues	46,346,808	46,775,404	45,171,368	43,419,223	45,688,787
kWh consumption					
Residential	79,412,777	84,640,053	81,849,797	88,206,887	88,831,489
Commercial	18,047,639	17,907,429	17,131,603	14,897,586	15,266,461
Industrial	230,956,902	229,161,432	221,121,719	204,301,436	211,402,742
Total kWh	328,417,318	331,708,914	320,103,119	307,405,909	315,500,692

3. The residential customer charge/daily access charge or equivalent for the utility's general service residential rate.

BED's current monthly residential customer charge is \$8.83.

4. The residential retail energy rate (\$/kWh) (specified by block if that applies).

BED's current residential retail energy rate is \$0.116173 for initial block (<= 100 kWh) and \$0.158815/kWh for the tail block (> 100 kWh).

BED notes that on June 9, 2022 it filed with the Commission a proposed BED-specific Energy Assistance Pilot Rate in accordance with the 30 V.S.A. § 218d(o) provisions and the Commission's Standards and Procedures for Innovative Rates and Services Offered by Municipal and Cooperative Electric Utilities that were effective as of January 20, 2022. As BED will be providing its own low-income rate through this program, BED supports Vermont Public Power Supply Authority's ("VPPSA's") position in its May 24, 2022, Motion for Reconsideration in this case that the Commission's authority is limited to approving utility-specific low-income rates and does not extend to authority to create a mandatory statewide low-income rate.

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,

A handwritten signature in black ink, appearing to read 'AW', is positioned above the typed name.

Amber Widmayer
Regulatory Specialist
Burlington Electric Department
(802) 735-6918