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*Via ePUC*

June 10, 2022

Holly Anderson, Clerk  
Vermont Public Utility Commission  
Peoples United Bank Building, 4th Floor  
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,

Green Mountain Power (“GMP”) welcomes the opportunity to provide answers to the four information requests set forth in the Public Utility Commission’s (“PUC” or the “Commission”) April 26, 2022, Order in Case No. 20-0203-INV, the Low-Income Rate Investigation.

***Q1. An estimate of the number of low-income customers (185 percent of federal poverty level) in the utility’s service territory.***

GMP Response

The population estimates from the Department of Public Service’s consultant<sup>1</sup> would indicate that GMP’s service territory had 47,303 households with income at or below 185% of the Federal Poverty Level (“FPL”) in 2018, which we estimate translates to 21.3% of non-duplicate<sup>2</sup> residential accounts. The Final Report by GDS Associates used statewide data and developed an

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<sup>1</sup> GDS Associates Inc., Assessment of the Green Mountain Power Energy Assistance Program Final Report November 2019, Table 5-1.

<sup>2</sup> Duplicate customers are customers who have secondary meters or street lighting accounts included in the total customer counts.

estimate of GMP customers by applying a factor of 70.6% to adjust for Vermont residential households served by GMP. Vermont data was compiled by Fisher, Sheehan & Colton using 5-year American Community Survey data compiled by the US Census Bureau. Fisher, Sheehan & Colton updates this data series<sup>3</sup> every year. For the 2021 calendar year, using the most recent 5-year American Community Survey data, GMP estimates that 45,101 households are at or below 185% of the FPL. Based on the number of non-duplicate residential accounts for GMP in 2021, this would imply the percentage of accounts at or below 185% of the FPL of 20.1% is somewhat lower but very similar to the data GDS compiled in 2018.

For a validation check, GMP also examined the 2021 American Consumer Survey data using population figures provided in the database for each Vermont zip code. For zip codes that have more than one utility providing service, we apportioned population data for the town based on the geographic area served by each utility using the service territory map on the PUC website.<sup>4</sup> Under this method, GMP's percentage of individuals at or below 185% of the FPL was 22.1% which equates to 49,619 households in 2021. A presentation of the results of that validation effort is included as Attachment 1.

***Q2. 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.***

#### GMP Response

Customer counts, annual revenue, and annual kWh are presented in the following table for 2017 through 2021.

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<sup>3</sup> <http://www.homeenergyaffordabilitygap.com>

<sup>4</sup> See <https://puc.vermont.gov/document/electric-service-territory-map>. For example, the total population and population at or below 185% in Tunbridge was apportioned 60% to GMP and 40% to WEC.

	2017	2018	2019	2020	2021
<b>Customers</b>					
Residential	237,686	237,933	238,299	237,956	239,870
Small C&I (Com.)	44,771	45,447	46,095	47,560	48,055
Large C&I (Ind.)	73	71	76	76	76
Public Street & Highway	158	159	158	157	159
Other Sales to Public	1	1	-	-	
<b>Total</b>	<b>282,689</b>	<b>283,611</b>	<b>284,628</b>	<b>285,749</b>	<b>288,160</b>
<b>Duplicate Customers</b>					
Residential	(16,301)	(15,952)	(15,551)	(15,199)	(15,351)
Small C&I (Com.)	(2,855)	(2,848)	(2,874)	(2,943)	(2,938)
Large C&I (Ind.)	(5)	(4)	(4)	(4)	(4)
Public Street & Highway					
Other Sales to Public					
<b>Total</b>	<b>(19,161)</b>	<b>(18,804)</b>	<b>(18,429)</b>	<b>(18,146)</b>	<b>(18,293)</b>
<b>Annual Revenue (Billed)</b>					
Residential	\$ 251,352,220	\$ 277,891,882	\$ 285,242,765	\$ 300,643,532	\$ 306,139,919
Small C&I (Com.)	216,441,335	232,465,492	238,792,694	228,189,405	238,538,140
Large C&I (Ind.)	115,027,405	121,620,896	123,820,283	121,296,773	122,762,931
Public Street & Highway	2,497,586	2,489,905	2,550,761	2,579,524	2,664,159
Other Sales to Public	421	499	-	-	
<b>Total</b>	<b>\$ 585,318,967</b>	<b>\$ 634,468,674</b>	<b>\$ 650,406,503</b>	<b>\$ 652,709,234</b>	<b>\$ 670,105,149</b>
<b>Annual kWh (Billed)</b>					
Residential	1,465,612,000	1,537,556,000	1,492,143,000	1,553,620,000	1,567,268,000
Small C&I (Com.)	1,503,087,000	1,528,010,000	1,472,886,000	1,373,606,000	1,420,172,000
Large C&I (Ind.)	1,170,493,000	1,167,732,000	1,145,941,000	1,110,448,000	1,114,139,000
Public Street & Highway	4,425,000	3,989,000	3,813,000	3,777,000	3,794,000
Other Sales to Public	28,000	34,000	-	-	
<b>Total</b>	<b>4,143,645,000</b>	<b>4,237,321,000</b>	<b>4,114,783,000</b>	<b>4,041,451,000</b>	<b>4,105,373,000</b>

**Q3. *The residential customer charge/daily access charge or equivalent for the utility's general service residential rate.***

GMP Response

\$0.515 per day for GMP Rate 1.

**Q4. *The residential retail energy rate (\$/kWh) (specified by block if that applies).***

GMP Response

\$0.17650 per kWh for GMP Rate 1.

GMP Additional Comments

The Commission also suggested that stakeholders consider how a future statewide or alternative program could be modeled. GMP has an Electric Assistance Program in effect and is working on updates and will propose revisions to that program to address, among other things, the statutory change in program eligibility from 150% to 185% of the FPL and the program fund shortfall. To offer alternative statewide proposals, GMP would need to review and analyze the data provided by other utilities. We plan to file our proposed updates as soon as feasible and have been watching the timeline of this proceeding in order to assess when changes to the GMP program that will impact both the eligibility and customer fee should be proposed.

Thank you for your attention to this matter, and if you have any questions, please feel free to call.

Sincerely,



Scott Anderson  
Manager of Rates

cc: Service list (via ePUC)

Enclosure