



March 3, 2023

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 Public Utility Commission's ("Commission's") February 3, 2023, Procedural Order Requesting Information.

ACRE

BED is not planning on participating in the Affordable Community Renewable Energy Program ("ACRE") due to the limited opportunities for such generation within Burlington's city limits.

IRA Low-Income Provisions

BED is considering program opportunities under many of the Inflation Reduction Act ("IRA") focus areas, including those listed below. While a number of these may provide economic benefit to low-income customers, creating a tariff-based link to one or more of these focus areas will require further consideration, as none of the provisions provide for a standalone for low-income rate program. BED is engaged in recurring internal meetings and outreach with potential community partners and participants to explore options for BED involvement under specific focus areas with income/equity components, to either offer a program directly or otherwise offer support to an appropriate entity.

- Increased Energy Credit for Solar/Wind in Low-Inc Communities
- Greenhouse Gas Reduction Fund
- Alternative Fuel Vehicle Refueling Property Credit
- Environmental & Climate Justice Block Grants

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585 Pine Street Burlington, VT 05401  
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- Neighborhood Access & Equity Grant Program
- Funding to Address Air Pollution at Schools

While BED has no concrete proposals at this time, BED will stay in communication with the Commission if it moves forward with program development under the IRA focus areas and will file any proposals or tariffs as necessary.

#### Other Programs

BED's Energy Assistance Pilot Rate ("Pilot Rate") as filed on June 9, 2022, in Case # 22A-2177 remains in effect. The Pilot Rate was filed under the 30 V.S.A. § 218d(o) provisions and the Standards and Procedures for Innovative Rates and Services Offered by Municipal and Cooperative Electric Utilities ("Standards and Procedures") that were approved by the Commission in Case No. 21-2642-INV and became effective as of January 20, 2022.

The Pilot Rate provides a 12.5% discount on BED charges (customer and energy) for residential non-net-metered customers whose household income is less than or equal to 185% of the federal poverty level ("FPL"). Customer income is verified externally based on eligibility for other Vermont assistance programs. BED uses proof of eligibility for Vermont Seasonal Fuel Assistance (which is based on 185% of FPL) or Vermont Section 8 Assistance (which is based on 50% of Area Median Income ("AMI")). BED is engaged in discussions about potential program eligibility expansion(s).

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,



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