



June 26, 2023

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Post Office Drawer 20
Montpelier, Vermont 05620-2701

Re: **Case No. 22-2954-PET** – Evernorth comments on equity and electric system benefits within Efficiency Vermont’s 2024-2026 Demand Resources Plan Update Proposal

Dear Clerk Anderson,

We understand that issues of electric system benefits are being discussed in this proceeding, and are writing to offer our perspective. Evernorth has a 35 year history of working to house low and moderate income Vermonters.

Low-income Vermonters have disproportionately higher energy burdens than higher income households; in New England, the energy burden on low-income households is estimated to be three times higher than the median. . As noted in the 2022 updated Comprehensive Energy Plan, “the burdens and benefits of energy policy in Vermont have not been equitably distributed across the state or its citizens.”

Energy efficiency incentives in Vermont over the last 20 years have not prioritized energy equity. In our transition to clean energy, it is imperative that the most vulnerable households are at the front of the line in this transition.

While we understand the importance for Efficiency Vermont to place a continued focus on delivering electric systems benefits, but we are concerned that placing an outsized and exclusive focus on this issue will undermine Efficiency Vermont’s ability to continue meeting the needs of the Vermonters we serve. In our experience, these customers face many barriers to participating in efficiency programs. It takes a long-term investment of resources, including significant time, support, and changes to program design - alongside increased monetary incentives - to address these barriers. These resource investments from Efficiency Vermont may not yield large electric savings, but they are critical to advancing Vermont’s equity goals and ensuring that everyone who pays the Energy Efficiency Charge has the opportunity to benefit from efficiency programs.

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evernorthus.org



Investing in communities. Building possibilities.

Evernorth has partnered with Efficiency Vermont for over twenty years. All of our multifamily rental housing benefits from consultation with Efficiency Vermont staff, and the energy efficiency incentives. We have constructed or renovated over 7,000 apartments across Vermont. In our 35 year history, we have been leaders in the energy efficiency and renewables field. Within our statewide portfolio, we have hundreds of apartments benefiting from advanced wood heating systems, solar DHW and PV, geothermal, and more recently, heat pumps.

Over the past year, I have been spending time researching and talking about, energy equity in housing. In my research, compared to other states like MA, CT or NY, Vermont lags in its efforts to *implement* a more equitable energy future.

In order to assure a more equitable energy future, the Efficiency Vermont framework must shift to include equity as a goal on parity with that of the electric system benefits. Simply said, it is time to move away from an incentive structure that looks for only the lowest cost measure, that is blind to the inequitable impact on low income Vermonters.

Sincerely,

A handwritten signature in black ink that reads "Kathy Beyer".

Kathy Beyer
SVP Real Estate Development

CC: Maura Collins/VHFA