

October 20, 2023

Holly Anderson, Clerk  
Vermont Public Utility Commission  
112 State Street  
Montpelier, Vermont 05620-2701

Re: Case No. 22-2954-PET  
Efficiency Vermont joint request to extend the deadline for Energy Efficiency Utilities (EEUs) to file their Demand Resource Plan (“DRP”) Triennial Plans to December 1, 2023

Dear Clerk Anderson:

On September 26, 2023 the Vermont Public Utility Commission (the “Commission”) issued Orders approving 2024-2026 DRPs for the Vermont EEUs: Efficiency Vermont, Burlington Electric Department (“BED”) and Vermont Gas (“VGS”). These Orders established October 20, 2023 as the deadline to submit a filing on the topic of a waiver or extension of the November 1, 2023 EEU DRP Triennial Plan filing deadline.<sup>1</sup> By this letter, Efficiency Vermont, on behalf of itself and the other EEUs (BED and VGS)(together the “EEUs”) respectfully requests that the Commission extend the deadline for EEUs to file their DRP Triennial Plans until December 1, 2023.

Pursuant to Section V.9.A(a) of the Process and Administration Document:<sup>2</sup>

A. The Commission shall provide, through such process that it deems appropriate, the public with an opportunity to comment upon the DRP Triennial Plan and Annual Plan updates. An EEU shall not be required to prepare a DRP Triennial Plan and/or Annual Plan updates for any period beyond the term of its Appointment. An EEU shall consult with the Department on the content of the Triennial Plan and Annual Plan updates during their development.

(a) Prior to the start of year one of a new performance period, an EEU shall prepare and submit to the Commission a DRP Triennial Plan by

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<sup>1</sup> See, for example, Case No. 22-2954-PET, Order Approving Efficiency Vermont’s 2024-2026 Demand Resource Plan, 9/26/2023, at 64 which provides:

Section V.9 of the Process and Administration of an Energy Efficiency Utility Order of Appointment requires Efficiency Vermont to file a triennial plan for the 2024-2026 performance period by November 1, 2023. To the extent that a waiver or extension of the November 1 filing date is required, the parties should make a joint filing on this topic by October 20, 2023.

Id.

<sup>2</sup> The term “Process and Administration Document” refers to the *Process and Administration of an Energy Efficiency Utility Order of Appointment* document as approved by the Commission on December 27, 2022 in Case No. 22-1647-PET.

November 1. As modeled in the DRP for twenty- and ten-year periods, EEU DRP Triennial Plans shall include a broad overview of an EEU's long-term electric, natural gas, and/or TEPF strategy, as applicable, for providing energy efficiency services and, at minimum, a summary of the following for the three-year period, including:

- i. Overall EEU objectives including an integrated market strategy for at least each of the two primary market sectors, Business and Residential;
- ii. Resource-acquisition and DSS activities and budgets;
- iii. QPIs;
- iv. EEU planned and self-directed evaluation activities and recently concluded evaluation results; and
- v. EEU planned and self-directed DSS applied research and development ("R&D") and recently concluded DSS R&D results.

The EEUs make this joint request to allow for sufficient time to produce DRP Triennial Plans following the Commission's Orders approving the EEUs' DRPs at the end of September. Though specific production processes and timelines may vary from one EEU to another, Efficiency Vermont relies on a two-month period to produce, review, finalize and file its Triennial Plan, including both internal production and review processes, as well as external consultation with the Department of Public Service as per P&A Section V.9.A. To enable sufficient time for the EEUs to produce, review, finalize and file their DRP Triennial Plans, Efficiency Vermont requests that the Commission grant an extension in the requirement to file a DRP Triennial Plan as called for under Section V.9 of the Process and Administration Document to December 1, 2023.

An advance copy of this request was shared with the parties. I am authorized to represent that the Burlington Electric Department and Vermont Gas join this request.

Should you seek additional information or have questions concerning this request, please do not hesitate to contact me.

Respectfully submitted,



By: \_\_\_\_\_  
Efficiency Vermont

cc: Parties of Record (via ePUC)