

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 22-2954-PET

Petition of Vermont Department of Public)
Service to open a proceeding to initiate an EEU)
Demand Resource Plan proceeding for the 2024-)
2026 and 2027-2029 performance periods)

MOTION OF EFFICIENCY VERMONT TO AMEND ITS
APPROVED 2024-2026 BASELINE DEMAND RESOURCE PLAN
TO ALLOW FOR THE USE OF ENERGY EFFICIENCY CHARGE FUNDS FOR
GREENHOUSE GAS EMISSIONS REDUCTION PROGRAMS
AUTHORIZED PURSUANT TO ACT NO. 44

Now Comes Efficiency Vermont¹ and requests that the Vermont Public Utility Commission (the “Commission”) approve amendments to its 2024-2026 Demand Resource Plan (“DRP”) to allow Efficiency Vermont to use funds raised via the Energy Efficiency Charge (“EEC”) for the implementation of greenhouse gas (“GHG”) emissions reduction programs as authorized by the Vermont General Assembly under Act No. 44 (the “DRP Amendment”).² In support of this Motion Efficiency Vermont represents as follows:

1. Efficiency Vermont is an entity appointed to provide electric energy efficiency and conservation programs and measures statewide pursuant to 30 V.S.A. § 209(d)(2)(A) for calendar years 2024 through 2026.

¹ Efficiency Vermont is the statewide Energy Efficiency Utility (“EEU”) administered pursuant to an Order of Appointment by the Vermont Energy Investment Corporation (“VEIC”). *See* Case No. 22-1647-PET, *VEIC Order of Appointment*, dated January 27, 2023.

² “Act No. 44” refers to *An act relating to energy efficiency modernization* as enacted by the Vermont General Assembly and signed into law on June 1, 2023 (“EEMA”). Act No. 44 affords the Commission the authorization to approve Act No. 151-type EEU programs through the 2024 to 2026 DRP performance period. For information on Efficiency Vermont’s Act No. 151-type programs please see Case No. 19-3272-PET, Order of 5/27/2021, and Exhibit EVT-CW-4 dated 22/12/2021.

2. By Orders issued September 26, 2023 and November 13, 2023 in Case No. 22-2954-PET, the Commission approved Efficiency Vermont’s 2024 to 2026 DRP Update (the “Baseline DRP”).

3. Efficiency Vermont’s 2024-2026 Baseline DRP was reviewed and approved by the Commission pursuant to the authority conferred pursuant to 30 V.S.A. § 209(d)(3)(B).

4. Efficiency Vermont’s total approved electric resource acquisition (“RA”) budget for the 2024 to 2026 performance period does not exceed its total electric RA budget for the 2021 to 2023 performance period, adjusted for cumulative inflation between January 1, 2021, and July 1, 2023, using the national consumer price index.³

5. Pursuant to Act No. 44, the Commission is granted jurisdiction to authorize an EEU whose approved RA budget for the 2024 to 2026 performance period does not exceed its 2021 to 2023 performance period RA budget, adjusted for inflation, to spend a portion of its electric RA budget, in an amount to be determined by the Commission but not to exceed \$2,000,000.00 per year, on programs, measures, and services that reduce GHG emissions in the thermal energy or transportation sectors, or both.⁴

6. In accordance with the jurisdiction granted to the Commission pursuant to Act No. 44, Efficiency Vermont has developed proposed amendments to its approved 2024 to 2026 DRP in order to include programs, measures, and services that: (1) reduce greenhouse gas

³ See Case No. 22-2954-PET Exhibit EVT-KL-7.

⁴ See Act No. 44 at Section 1(b).

emissions in the thermal energy or transportation sectors, or both; (2) have a nexus with electricity usage; and (3) are additive and complementary to, and do not replace or compete with, electric utility energy transformation projects implemented pursuant to 30 V.S.A. § 8005(a)(3) (“Tier 3 programs”) such that they result in the largest possible greenhouse gas emissions reductions in a cost-effective manner (the “EEMA programs”, “Act No. 44 programs” or “emissions reduction programs”).

7. Efficiency Vermont’s proposed amendments to the programs, services and measures authorized in its 2024-2026 Baseline DRP are described in the Affidavits and supporting Exhibits and Attachments that are included with this Motion.

8. Efficiency Vermont’s proposed DRP Amendment was developed in consultation with relevant State agencies and the Vermont Department of Public Service (the “Department”), and its initiatives are not duplicative or in competition with programs delivered by said agencies or the Department.⁵

9. The DRP Amendment now proposed by Efficiency Vermont will be delivered on a statewide basis. However, if any of these funds are used for services specific to a retail electricity provider, the funds used for services to each retail electricity provider for calendar years 2024 to 2026 shall be reasonably proportionate to the EEC funding collected in that territory.⁶

⁵ See Case No. 22-254-PET, Exhibit EVT-KL-7.

⁶ Id.

10. As described in Efficiency Vermont’s Affidavits, supporting Exhibits and Attachments, the amendment proposed to its approved Baseline DRP will be provided in cooperation with the retail electricity providers located in Efficiency Vermont’s service area.⁷

11. As required under Section 1(c)(1) of Act No. 44, Efficiency Vermont will not claim any savings and reductions in fossil fuel consumption or in GHG emissions by the customers of any retail electricity provider resulting from the programs, measures, or services if said retail electricity provider elects to offer the program, measure, or service pursuant to 30 V.S.A. § 8005(a)(3) unless Efficiency Vermont and the electricity provider agree upon how savings and reductions should be accounted for, apportioned, and claimed.

12. Efficiency Vermont proposes that its amended 2024-2026 DRP be subject to the monitoring and evaluation terms and conditions of its approved DRP including the strategies developed to measure the effectiveness of the programs, measures, and services developed and approved in this Demand Resources Plan Proceeding (“DRPP”).

13. In part, Act No. 44 was enacted to allow for the continuation of the pilot GHG emissions reduction programs first authorized under Act No. 151 for the 2021-2023 performance period throughout the 2024-2026 performance period.⁸ In order to allow for the delivery of approved emissions reduction programs throughout the 2024-2026 performance period, Efficiency Vermont requests expedited review of this Motion and asks the Commission pursuant

⁷ Id.

⁸ Act No. 151, *An act relating to energy efficiency entities and programs to reduce greenhouse gas emissions in the thermal energy and transportation sectors*, was enacted by the Vermont General Assembly and signed into law on September 23, 2020. Like Act No. 44, Act No. 151 authorized the Commission to allow Efficiency Vermont to use funds raised via the EEC for the implementation of GHG emissions reduction programs.

to Rules 1.200 and 2.107 to waive the requirements of any rule that would slow the review of Efficiency Vermont’s request.

14. In support of this Motion Efficiency Vermont files the following Affidavits, supporting Exhibits and Amended Attachments:⁹

<u>Affiant</u>	<u>Subject Matter of Affidavit</u>
Kelly Lucci	Witness Lucci’s Affidavit offers a description of the proposed amended Efficiency Vermont programs, services and measures including the proposed Act No. 44 programs. The affidavit also provides information in support of the Commission’s exercise of the jurisdiction conferred under Act No. 44 to approve the proposed DRP Amendment. Witness Lucci also sponsors Efficiency Vermont’s Proposal on 2024-2026 Energy Efficiency Modernization Act Programs marked as Exhibit EVT-KL-7.
Jay Pilliod	Witness Pilliod’s Affidavit sponsors Efficiency Vermont’s updated portfolio modeling, budgets and performance metrics associated with the proposed DRP Amendment. The affidavit also describes and sponsors updated modeling results and performance compensation tables that reflect the changes brought about on account of the change in services call for under the proposed DRP Amendment. Witness Pilliod also sponsors Efficiency Vermont’s Amended DRP Model Results for its 2024-2043 Electric Demand Resources Plan and 2024-2033 TEPF Demand Resources, marked as Exhibit EVT-JP-2, ¹⁰ and proposed Amended Attachment #2 - 2024-2026 Performance Compensation Tables. ¹¹

⁹ Proposed Amended Attachment #2 amends the Updated Attachment #2 filed by Efficiency Vermont on November 16, 2023 in this DRPP. An amended form of Corrected Compliance Filing Attachment #3, filed November 1, 2023, is included as Appendix A, *Resource Acquisition Modeling Results*, in Exhibit EVT-JP-2. Efficiency Vermont’s DRP Amendments would not alter Updated Compliance Filing Attachment #1 also filed on November 16, 2023.

¹⁰ To facilitate review, Exhibit EVT-JP-2 updates Efficiency Vermont’s Baseline DRP Model, Exhibit EVT-JP-1, and is provided in both redline and clean formats.

¹¹ Note that Exhibit EVT-JP-2 has been updated to reflect the results of the Commission’s Orders of September 26, 2023 and November 2, 2023 in this DRPP.

15. Efficiency Vermont’s Affidavits, supporting Exhibits and Amended Attachment provide the information called for under the Commission’s Order of November 2, 2023 including:

1. Quantified budgets and benefit-related tradeoffs and a discussion of how the Act No. 44 proposal better meets (or continues to meet) 30 V.S.A. § 209(d)(3)(B);
2. How the Commission’s decision on the minimum performance requirement addressing electric system benefits affects the performance of baseline electric portfolio programs approved on September 26, 2023, and a comparison of this baseline performance to the performance anticipated under the Act No. 44 proposal;
3. Proposed changes to electric quantifiable performance indicators (“QPIs”) and minimum performance requirements approved on September 26, 2023;
4. Proposed additional QPIs and minimum performance requirements associated with Act No. 44; and
5. Estimated electric rate and bill impacts resulting from the DRP approved on September 26, 2023, compared to those estimated under the Act No. 44 proposal.

This supporting information also addresses changes in yield rates (cost of savings), changes in technical reference manual measure characterizations, and changes in the minimum performance requirement addressing electric system benefits.¹²

¹² See Case No. 22-2954-PET, Order of 11/2/2023 at 7 and 9-11.

REQUEST FOR RELIEF

WHEREFORE, Efficiency Vermont respectfully requests that the Commission:

- (1) Convene such proceedings as are necessary or appropriate to consider Efficiency Vermont's proposed 2024 to 2026 DRP Amendment in an expedited manner;
- (2) Waive any rules or requirements that would slow the review of this Motion to amend Efficiency Vermont's 2024-2026 DRP pursuant to PUC Rules 1.200 and 2.107;
- (3) Make such findings of fact and conclusions of law as are required under 30 V.S.A. § 209 and Act No. 44;
- (4) Find that the proposed amendment to Efficiency Vermont's 2024 to 2026 Baseline DRP will be beneficial to the ratepayers of the companies where Efficiency Vermont provides EEU services and satisfies the requirements of Act No. 44;
- (5) Authorize Efficiency Vermont to undertake the actions as described herein and in its Affidavits and supporting Exhibits and Amended Attachment; and
- (6) Issue an Order amending Efficiency Vermont's 2024 to 2026 Baseline DRP in accordance with this Motion and Efficiency Vermont's supporting materials.

REQUEST FOR EXPEDITED REVIEW

Efficiency Vermont's existing pilot emissions reduction programs that were approved pursuant to Act No. 151 by the Commission's Order of May 27, 2021 in Case No. 19-3272-PET are terminating or pausing with the expiration of the authorizations granted for these activities. On September 29, 2023, Efficiency Vermont filed a request with the Commission seeking interim authorization to continue the delivery of certain of its approved Act No. 151 programs beginning January 1, 2024, while the Commission reviewed Efficiency Vermont's plans for the

implementation of Act No. 44 with contested case procedures.¹³ By Order issued November 2, 2023, the Commission denied Efficiency Vermont’s request¹⁴ and encouraged parties “to propose time-efficient schedules for our review of Act 44 proposals.”¹⁵ The Commission states:

We also encourage parties to include a proposed schedule that allows the Commission to conduct a substantive review of the amended DRP proposals, but also identifies opportunities to expedite the proceeding and limit the delays in implementing Act 44 programs.

Id. at 11.

In accordance with the Commission’s instruction, on November 9, 2023, Efficiency Vermont provided notice of its intent to file a revised case schedule for the review of its DRP Amendment in lieu of its procedural recommendation made October 26, 2023,¹⁶ and to focus the amendment on the emissions reduction programs to be implemented pursuant to Act No. 44. Subsequent to providing notice Efficiency Vermont shared a draft of its procedural proposal with parties. Efficiency Vermont’s proposal leads to a Commission ruling by early-January and is predicated on Efficiency Vermont’s efforts to file all necessary information to support the issuance of the requested authorizations with this Motion.

The issuance of an Order by early-January on Efficiency Vermont’s DRP Amendment would limit to the greatest extent possible any delay in program activities and help to minimize

¹³ See Case No. 22-2954-PET, *Efficiency Vermont Proposed Phase II Schedule and Status Update*, dated 10/26/2023.

¹⁴ Note that the Commission’s November 2, 2023 Order also denied a similar request for the continuation of Act No. 151 programs brought by the Burlington Electric Department (“BED”).

¹⁵ See Case No. 22-2054-PET, Order of 11/2/2023 at 9.

¹⁶ See Case No. 22-2954-PET, *Efficiency Vermont Status Update and Procedural Recommendation*, dated 10/26/2023.

the disruption that the restart of programs will have on customers and program partners. Toward that end Efficiency Vermont does not believe that a hearing is required on its Motion and instead proposes that the Commission convene a workshop if it finds it necessary to address questions or comments. While this proposal is expedited, it is based on Commission Rule 2.206 concerning Motions, Responses to Motions, and Replies in Support of Motions. However, Efficiency Vermont seeks a waiver pursuant to Rules 1.200 and 2.107 as may be necessary or required in order for the Commission to consider this Motion in the expedited manner proposed in this submission.¹⁷

When Efficiency Vermont sought the Commission’s authorization to continue certain of its Act No. 151 programs it raised the concern that a pause in program activity would disrupt program partners and customers. As recommended in the Order of November 2nd, Efficiency Vermont developed a procedural recommendation that would minimize the disruption in program activity. Efficiency Vermont contends that it has presented good cause for the Commission to adopt Efficiency Vermont’s scheduling proposal and decide this Motion to Amend the DRP on an expedited basis.

¹⁷ Commission Rule 1.200, concerning exceptions to Rules, provides:

Except where prohibited by statute or by the terms of the rule, itself, the Commission may for good cause grant exceptions in particular cases to any provision of these rules.

Commission Rule 2.107, concerning the Waiver of Rules, provides in pertinent part:

To prevent unnecessary hardship or delay, to prevent injustice, or for other good cause, the Commission may waive the application of a rule under such conditions as it may require, unless precluded by the rule or by statute....

PROPOSED SCHEDULE

Efficiency Vermont offers the following proposed schedule for the review of its Motion for approval of a DRP Amendment:

DATE	ACTIVITY	DESCRIPTION
November 17, 2023 Efficiency Vermont files:	1. Motion to Amend its 2024-2026 Baseline DRP to include delivery of EEMA Programs	Formal request to amend the 2024-2026 Baseline DRP approved on September 26, 2023 and November 13, 2023 in Case No. 22-2954-PET.
	2. Request for Expedited Review and waiver of PUC Rules	Request for Commission to hear the Motion on an expedited basis to enable EEMA Program delivery starting in early 2024. To include a request to waive any rules applicable to the Motion under Rules 1.200 and 2.107.
	3. Procedural Recommendation	Proposed Schedule: 11/17/23 – EVt Files Motion 12/08/23 – Parties file Comments 01/08/24 – Order Target Date
	4. EEMA Program Plan including: (i) GHG Emissions Reduction Program Proposal; (ii) Amended DRP Model Results; (iii) Amended Performance Compensation Tables; and (iv) Amended RA Modeling Results	<ul style="list-style-type: none"> ▪ Description of proposed EEMA Programs and Budgets ▪ Discussion of budget reallocations and tradeoffs ▪ Impact of EEMA proposal on performance metrics and compensation tables ▪ Estimated electric rate and bill impacts ▪ Affirmative information to support the required findings under Act. No. 44
	5. Affidavits to support the findings called for under Act 44	<ul style="list-style-type: none"> a. <u>Jay Pilliod Affidavit</u> ▪ Sponsors Amended DRP Model; presentation of tradeoffs: reduction in modeled results as a result of implementing EEMA programs

		<ul style="list-style-type: none"> ▪ Presentation of QPI impacts, including estimated low income spending and MPR #9 analysis <ul style="list-style-type: none"> b. <u>Kelly Lucci Affidavit</u> ▪ Sponsors EEMA Plan, program descriptions and budgets
	6. Memorandum of Law	Discussion to demonstrate how the EEMA Programs meet the requirements of Act 44
	7. Form of Proposed Order	Specific text to define the authorizations sought under the Motion.
November 17, 2023 to December 8, 2023	Informal Discovery	EVt responds to informal discovery from parties
December 8, 2023 Parties file:	Comments on Efficiency Vermont Motion and supporting materials	DPS and Parties file response to EVt request to implement EEMA programs and amend approved 2024-2026 Baseline DRP
Target Order Date	January 8, 2024	Expedited review sought to enable swift implementation of approved Act 44 initiatives

MEMORANDUM OF LAW IN SUPPORT OF MOTION

Act No. 44 confers requisite authority on the Commission to approve Efficiency Vermont’s proposed thermal and transportation sector GHG emissions reduction programs for implementation during the 2024 to 2026 DRP performance period. As will be discussed, and as described in Efficiency Vermont’s averments, Affidavits, supporting Exhibits and Attachment, this request satisfies all requirements established under Act No. 44 for the issuance of Commission approval for the use of EEC funding for the delivery of GHG emissions reduction

programs in the thermal energy and transportation sectors.¹⁸

Act No. 44 was promulgated by the Vermont General Assembly to continue the authority for the delivery of GHG emissions reduction programs in the 2024 to 2026 performance period.

Similar to Act No. 151 before it, pursuant to Act No. 44 Section (1)(A):

The electric resource acquisition budget for an entity appointed to provide electric energy efficiency and conservation programs and measures pursuant to 30 V.S.A. § 209(d)(2)(A) for the calendar years 2021-2026 shall be determined pursuant to 30 V.S.A. § 209(d)(3)(B). This section shall apply only if the entity's total electric resource acquisition budget for 2024-2026 does not exceed the entity's total electric resource acquisition budget for 2021–2023, adjusted for cumulative inflation between January 1, 2021, and July 1, 2023, using the national consumer price index.

Id. As discussed in this Motion and supporting Affidavits and Exhibits, Efficiency Vermont's request is consistent with the requirements of Act No. 44 Section (1)(A). Also pursuant to Act No. 44 Section (1)(B):

Notwithstanding any provision of law or order of the Public Utility Commission (PUC) to the contrary, the PUC shall authorize an entity pursuant to subsection (a) of this section to spend its electric resource acquisition budget, in an amount to be determined by the PUC but not to exceed \$2,000,000.00 per year, on programs, measures, and services that reduce greenhouse gas emissions in the thermal energy or transportation sectors. Programs, measures, and services authorized pursuant to subsection (a) of this section shall:

- (1) Reduce greenhouse gas emissions in the thermal energy or transportation sectors, or both.
- (2) Have a nexus with electricity usage.
- (3) Be additive and complementary to and shall not replace or be in competition with electric utility energy transformation projects pursuant to 30 V.S.A. § 8005(a)(3) and existing thermal efficiency programs operated by an

¹⁸ Note that Section 1(b) of Act No. 44 makes clear that the Commission "shall" authorize an entity pursuant to subsection (a) of this section to spend a portion of its electric resource acquisition budget on qualifying GHG emissions reduction programs when the Commission finds that the proposal satisfies subparts (1) through (5) of the subsection.

entity appointed under 30 V.S.A. § 209(d)(2)(A) such that they result in the largest possible greenhouse gas emissions reductions in a cost-effective manner.

(4) Be proposed after the entity consults with any relevant State agency or department and shall not be duplicative or in competition with programs delivered by that agency or department.

(5) Be delivered on a statewide basis. However, this shall not preclude the delivery of services specific to a retail electricity provider. Should such services be offered, all distribution utilities and Vermont Public Power Supply Authority shall be provided the opportunity to participate, and those services shall be designed and coordinated in partnership with each of them. For programs and services that are not offered on a statewide basis, the proportion of utility-specific program funds used for services to any distribution utility shall be no less than the proportionate share of the energy efficiency charge, which in the case of Vermont Public Power Supply Authority, is the amount collected across their combined member utility territories during the period this section remains in effect.

Id. Additionally, pursuant to Act No. 44 Section 1(c):

An entity that is approved to provide a program, measure, or service pursuant to this section shall provide the program, measure, or service in cooperation with a retail electricity provider.

(1) The entity shall not claim any savings and reductions in fossil fuel consumption and in greenhouse gas emissions by the customers of the retail electricity provider resulting from the program, measure, or service if the provider elects to offer the program, measure, or service pursuant to 30 V.S.A. § 8005(a)(3) unless the entity and provider agree upon how savings and reductions should be accounted for, apportioned, and claimed.

(2) The PUC shall develop standards and methods to appropriately measure the effectiveness of the programs, measures, and services in relation to the entity's Demand Resources Plan proceeding.

Id. As described in the Affidavits and supporting Exhibits, and in the Case Nos. 19-3272-PET and 22-2954-PET record evidence, Efficiency Vermont is or has provided information to satisfy all of the requirements for the approval of emissions reduction programs pursuant to Act No. 44.

As demonstrated in this DRPP, in Case No. 19-3272-PET,¹⁹ and in this Motion and supporting Affidavits and Exhibits, Efficiency Vermont’s proposed DRP Amendment is consistent with the requirements for approval of GHG emissions reduction programs by the Commission as established pursuant to Act No. 44.²⁰ Also as demonstrated in this DRPP and in Case No. 19-3272-PET, the budget proposed for Efficiency Vermont satisfies the requirements of Act No. 44 that are a precondition to the approval of EEC funded emissions reduction programs. Accordingly, Efficiency Vermont contends that it has made an affirmative showing that the issuance of an order authorizing the implementation of the proposed DRP Amendment is consistent with the authority conferred on the Commission under Act No. 44.

¹⁹ Please note that reference is made in this Motion to the Case No. 19-3272-PET record evidence. Pursuant to the *Order Addressing Schedule, Administrative Notice, and Demand Resources Plan Update Period* dated October 13, 2022 in this DRPP, pursuant to 3 V.S.A. § 810(4), the Commission took administrative notice of the record evidence and orders in Case No. 19-3272-PET.

²⁰ *See, in particular*, Exhibits EVT-KL-7 and EVT-JP-2.

FORM OF PROPOSED ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Public Utility Commission of the State of Vermont that:

1. Efficiency Vermont’s Demand Resource Plan (“DRP”) Amendments as described in its Motion and supporting materials dated November 17, 2023 is approved.

2. Efficiency Vermont is authorized to use a portion of the funding received through the energy efficiency charge for the implementation of greenhouse gas emission reduction programs targeted at the thermal energy and transportation sectors as called for under Vermont Public Act No. 44.

3. The electric resource-acquisition budgets for Efficiency Vermont for the 2024-2026 performance period approved in the September 26, 2023 and November 13, 2023 Orders shall be amended to reflect the changes authorized in this Order approving Efficiency Vermont’s Motion for approval of a DRP Amendment.

4. The electric and thermal-energy-and-process-fuels quantifiable performance indicators and minimum performance requirements for Efficiency Vermont for the 2024-2026 performance period, including corresponding incentive amounts for each target, minimum targets, 100% target levels, scaling calculations, and financial consequences for under-performance, shall be those in the Attachment to this Order.²¹

²¹ See Case No. 22-29954-PET, Efficiency Vermont proposed Amended Attachment #2 dated 11/17/2023.

5. Efficiency Vermont shall not claim any savings and reductions in fossil-fuel consumption or in greenhouse gas emissions by the customers of any distribution utility resulting from a program, measure, or service authorized pursuant to this order if said distribution utility elects to offer the program, measure, or service, pursuant to 30 V.S.A. § 8005(a)(3), unless Efficiency Vermont and the distribution utility agree on how savings and reductions should be accounted for, apportioned, and claimed.

6. Within 30 days of the issuance of this Order, Efficiency Vermont shall file an updated triennial plan for the 2024-2026 performance period, and other materials necessary to reflect the revisions to the Baseline Demand Resources Plan approved in this Order.

7. Within 90 days of the issuance of this Order, the Vermont Department of Public Service (“Department”) shall file a recommendation with the Commission proposing a set of reasonable standards and methods for the evaluation of Efficiency Vermont’s Act No. 44 programs. If the recommendation does not reflect a consensus among stakeholders, comments and recommendations regarding the procedures to be employed in the Commission’s review of the proposed standards and methods shall be filed within 14 days of the filing.

CONCLUSION

For the reasons discussed in this Motion, Efficiency Vermont requests that the Commission commence expedited proceedings to review and approve its proposed DRP Amendment in order to allow for the implement of the proposed Act No. 44 GHG emissions reduction programs during the 2024 to 2026 performance period.

DATED at WINOOSKI, VERMONT this 17th day of November 2023.

RESPECTFULLY SUBMITTED,
EFFICIENCY VERMONT

By: /s/MORRIS L. SILVER

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