STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 22-2954-PET

Petition of Vermont Department of Public Service to initiate an EEU Demand Resources Plan proceeding for the 2024-2026 performance period	

Order entered: 01/10/2024

ORDER APPROVING BURLINGTON ELECTRIC DEPARTMENT'S AMENDED DEMAND RESOURCES PLAN FOR 2024 AND REQUIRING FURTHER PROCESS FOR 2025 AND 2026

In this Order, the Vermont Public Utility Commission ("Commission") adopts the findings, conclusions, and recommendations made in the Hearing Officer's proposal for decision.

PROPOSAL FOR DECISION

I. INTRODUCTION

In this proposal for decision, I recommend that the Commission approve amendments to the City of Burlington Electric Department's ("BED") Demand Resources Plan ("DRP") for the 2024-2026 performance period to allow for the implementation of greenhouse gas emission reduction programs as authorized by Public Act No. 44.[1] Act 44 provides for an additional three years, 2024-2026, of the pilot program established in Public No. Act 151[2] that allows the use of electric energy efficiency charge funds for greenhouse gas emission reduction programs.

The DRP amendments include an approximately $758,991 reallocation of spending in the previously approved resource-acquisition budgets to implement Act 44 transportation and heating sector programs and include adjustments to the performance goals for the 2024-2026 performance period to reflect the reallocation of spending. Additionally, BED proposes to use $600,000 of Regional Greenhouse Gas Initiative ("RGGI") proceeds and Forward Capacity Market revenues generated after January 1, 2024, to support two new programs that reduce greenhouse gas emissions.

I recommend that the Commission approve BED's proposed DRP amendments for the first year of the 2024-2026 performance period. For the second and third year of the performance period, I recommend the Commission allow for further process to examine whether

[1] Vermont Public Act No. 44 (2023 Vt., Bien. Sess.).
[2] Vermont Public Act No. 151 (2020 Vt., Adj. Sess.).

the proposed programs and budget levels for 2025 and 2026 result in the largest possible greenhouse gas emission reductions in a cost-effective manner.

II. Procedural History

In a September 26, 2023, Order, the Commission approved BED's DRP for the 2024-2026 performance period.[3]

On October 26, 2023, BED made a compliance filing for its approved DRP that included revised Plan A budgets, quantifiable performance indicators ("QPIs"), and minimum performance requirements ("MPRs").

On November 3, 2023, BED made compliance filings with corrected QPIs and MPRs for the revised Plan A DRP.

On November 14, 2023, BED filed its amended 2024-2026 DRP ("Revised Plan B") to allow BED to implement greenhouse gas emission reduction programs as authorized by Act 44.

On December 15, 2023, the Vermont Department of Public Service ("Department") filed comments recommending a reduction to BED's proposed budgets of 25% per year over three years.

Also on December 15, 2023, BED filed comments that included revisions to the QPIs and MPRs for its amended DRP.

On December 22, 2023, BED filed comments responding to the Department's recommendations.

No party has requested an evidentiary hearing or objected to the prefiled comments and exhibits. Accordingly, the following comments and exhibits are admitted as if presented at a hearing: Exhibit Plan A (revised 11/3/23), BED November 14 Comments and exhibit BED-C; Department December 15 Comments; BED December 15 Comments; and BED December 22 Response.

III. Legal Standard

Section 1(a) of Act 44 requires that the electric resource-acquisition budgets 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 must be determined

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[3] *Order Approving 2024-2026 Demand Resource Plan Update for Burlington Electric Department*, Case No. 22-2954-PET, Order of 9/26/23 ("September 26 Order").

pursuant to 30 V.S.A. § 209(d)(3)(B). In addition, Section 1(a) applies only if an Energy Efficiency Utility's ("EEU's") approved electric resource-acquisition budgets for 2024-2026 do not exceed the EEU's approved electric resource-acquisition budgets for 2021-2023, adjusted for cumulative inflation between January 1, 2021, and July 1, 2023, using the national consumer price index.

Section 1(b) of Act 44 requires the Commission to authorize a qualifying EEU to spend its electric resource-acquisition budgets, in an amount to be determined by the Commission but not to exceed $2,000,000 per year, on programs, measures, and services that reduce greenhouse gas emissions in the thermal energy or transportation sectors.

Pursuant to Section 1(b) of Act 44, the programs, measures, and services must:

(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 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.

Section 1(c) of Act 44 requires that an EEU approved to provide a program, measure, or service pursuant to the Act do so in cooperation with a retail electricity provider. Section 1(c)(1) provides that the EEU 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 EEU and provider agree upon how savings and reductions should be accounted for, apportioned, and claimed. Further, Section 1(c)(2) requires that the Commission develop standards and methods to appropriately measure the effectiveness of the programs, measures, and services in relation to the EEU's DRP proceeding.

Section 1(d) of Act 44 requires that any funds spent on programs, measures, and services pursuant to the Act not be counted towards the calculation of funds used by a retail electricity provider for energy transformation projects pursuant to 30 V.S.A. § 8005(a)(3) and the calculation of project costs pursuant to 30 V.S.A. § 8005(a)(3)(C)(iv).

Under Section 1(c)(f) of Act 44, notwithstanding 30 V.S.A. § 209(e), a retail electricity provider that is also an entity appointed under 30 V.S.A. § 209(d)(2)(A) may, during the years 2024–2026, use monies subject to 30 V.S.A. § 209(e) to deliver thermal and transportation measures or programs that reduce fossil fuel use regardless of the preexisting fuel source of the customer, including measures or programs permissible under this pilot program, with special emphasis on measures or programs that take a new or innovative approach to reducing fossil fuel use, including modifying or supplementing existing vehicle incentive programs and electric vehicle supply equipment grant programs to provide incentives to high-consumption fuel users, especially individuals using more than 1,000 gallons of gasoline or diesel.[4]

IV. BED's Revised Demand Resources Plan

In the following findings and discussion, I address whether the proposed amendments to BED's DRP meet the requirements of Act 44 and make my recommendations for Commission approval.

Act 44 Section 1(a) – Eligibility

1. Pursuant to 30 V.S.A. § 209(d)(2), BED has been appointed by the Commission to provide EEU services throughout its service territory of the City of Burlington. *See Final Order Regarding Overall Performance Assessment of Burlington Electric Department as an Energy Efficiency Utility*, Case No. 21-1500-PET, Order of 2/28/22.

2. For the 2024-2026 performance period, pursuant to 30 V.S.A. § 209(d)(3)(B), the Commission approved the following resource-acquisition budgets funded by the electric energy efficiency charge for BED:

[4] This funding is separate from the up to $2 million allowed from the electric resource acquisition budget.

2024	2025	2026	Total
$2,484,100	$2,523,100	$2,581,820	$7,589,020

Exhibit BED-1 (revised) at 6; September 26 Order at 9.

3. For the 2021-2023 performance period for BED, the Commission approved a total electric resource-acquisition budget of $7,351,606. BED's approved electric resource-acquisition budgets for the 2024-2026 performance period does not exceed its approved electric resource-acquisition budgets for the 2021-2023 performance period, adjusted for cumulative inflation between January 1, 2021, and July 1, 2023, using the national consumer price index. Exhibit BED-1 (revised) at 6; BED November 13 Comments at 7; *see* September 26 Order.

Act 44 Section 1(b) - Budgets and Programs

4. BED proposes to spend approximately $775,000 of its approved electric resource-acquisition budgets for the 2024-2026 performance period on the delivery of programs, services, and measures that reduce greenhouse gas emissions in the thermal and transportation sectors. BED November 13 Comments at 1-3; exh. BED-C at 6.

5. BED's Act 44 proposal will not exceed the spending limit of $2 million per year for the course of the 2024-2026 performance period. BED November 13 Comments at 1-3.

6. BED's Act 44 programs will continue and build on the thermal and transportation programs implemented under Act 151 during the 2021-2023 performance period. The transportation programs will focus on electric vehicle market development and transformation: (1) electric vehicle supply-chain dealership support, (2) enhanced incentives for new and used electric vehicles, and (3) enhanced incentives for electric vehicle supply equipment ("EVSE") in single-family, multi-family, and workplace/retail locations, with some locations in neighborhoods designated as disadvantaged communities. The thermal programs will focus on advanced heat pump technology and provide incentives for geothermal well testing. BED November 13 Comments at 3-4; exh. BED-C at 30-35.

7. The transportation programs will leverage the existing "preferred dealer network" of electric vehicle dealers that will host educational events and share materials to increase the awareness of electric vehicles and the benefits of electric driving. Exh. BED-C at 35.

8. BED proposes EVSE development in single-family, multi-family, and workplace or retail locations. Single-family EVSE must participate in BED's electric vehicle ("EV") rate tariff to be eligible for an incentive. The multi-family program encourages the adoption of

advanced EVSE equipment with embedded features that include the ability to charge users variable rates and reserve specific time slots. Such features may allow a property owner to offset the remaining investment in EVSE equipment. BED will require that EVSE located at multi-family locations be publicly available during typical business hours. Exh. BED-C at 34.

9. The proposed transportation programs will encourage equity and access. For a workplace or retail location to qualify for an EVSE incentive, it must be in a federally designated disadvantaged community. Exh. BED-C at 34-35.

10. BED proposes to provide assistance for EVSE installation. All market-rate customer incentives will be capped at 75% of installed costs. Income-eligible customers are eligible to receive an additional $1,000 EV incentive and $500 EVSE incentive. Income-eligible incentives will be capped at 100% of installed costs. Exh. BED-C at 41.

11. The geothermal heat pump system program ("GTHP") focuses on the cost barrier for test wells. This program offers commercial building owners or developers incentives to offset the cost of the test well to determine the potential of a geothermal heat pump as a building's primary heating and cooling system. BED will also require that such projects be enrolled in BED's new construction program, if applicable. Exh. BED-C at 35-36.

12. BED proposes supporting innovation through three DeltaClime events. DeltaClime is focused on emerging technologies and startups that will help Burlington and Vermont to combat climate change and yield tangible new opportunities to achieve greenhouse gas reductions. Exh. BED-C at 36.

13. BED proposes to alter planned spending on programs and services in its approved 2024-2026 DRP to accommodate its proposed Act 44 programs. BED proposes the following annual shifts in resource-acquisition programs and budgets:

Budget shifted from these programs to Act 44 programs	**Budgets**
Commercial	($531,294)
Residential	($227,697)
Total	($758,991)

Budget shifted to these Act 44 programs	**Budgets**
Electric vehicle and EVSE program incentives	$291,452
Heat pump incentives	$269,539
DeltaClime	$48,000
GeoTesting	$135,000
Preferred Dealer Network	$15,000
Total	$758,991

BED November 13 Comments at 2-3; exh. BED-C at 31.

14. BED's Act 44 proposal does not result in the termination of any approved DRP or Renewable Energy Standard ("RES") Tier 3 programs. The commercial and residential programs will be operated at reduced budgets without sacrificing the integrity or sustainability of the existing programs. The Act 44 proposals will not compete with BED's Tier 3 programs but will be complementary. Exh. BED-C at 30.

Act 44 Section 1(c)(f) - Thermal Energy and Process Fuel Efficiency Funding

15. BED proposes to use $600,000 of RGGI proceeds and Forward Capacity Market revenues generated after January 1, 2024 (TEPF funds), to support two new Act 44 programs: the SuperUsers program and custom commercial retrofit program. Exh. BED-C at 41-43.

16. Approximately $150,000 will be used to support the SuperUsers program and $450,000 will be used to support the custom commercial retrofit program. BED November 13 Comments at 4.

17. To support its Act 44 TEPF activities, BED proposes to reduce its VERMOD program by $147,000. The remaining funds are coming from the TEPF surplus that was identified when the Commission approved its DRP in September. BED November 13 Comments at 4-5; exh. BED-C at 38.

18. The SuperUsers program focuses on customers consuming 700 or more gallons of gasoline for transportation, while the custom commercial retrofit program enhances incentives for Tier 3 projects to ensure that major renovation or new construction projects incorporate electrification and exceed existing building codes and local ordinances. BED November 13 Comments at 4; exh. BED-C at 4, 37, 42.

19. For its SuperUsers program, BED proposes up to a $250 incentive that is in addition to the Tier 3 incentive, enhanced income-eligible incentives, if applicable, and any other state, federal, or manufacturer's incentive to customers who are able to demonstrate that they consume 700 gallons or more of gasoline annually for transportation. Customers who demonstrate they consume over 1,000 gallons annually can qualify for another $250 incentive. Customers who consume 700 gallons or more may also receive a $250 per eligible Level 2 EVSE if enrolled in BED's electric vehicle rate tariff. BED states that proof of eligibility will include self-certification of having travelled more than 17,700 miles (or purchasing 700 gallons) or 25,300

miles (or purchasing 1,000+ gallons) during the most recent 12-month period in a personal vehicle with an internal combustion engine. Exh. BED-C at 41.

20. In its custom commercial retrofit program, BED proposes to target projects that have long measure lives (i.e., 20+ years) and will result in significant overall greenhouse gas emission reductions. Projects may include but are not limited to advanced heat pump projects (ground-source heat pumps, air-to-water heat pumps, variable refrigerant flow heat pumps, and air-source heat pumps – ducted or ductless), electric buses, EVSE, and building-envelope projects (weatherization, advanced windows, and window systems). BED-C at 42.

21. BED proposes an estimated incentive for the custom commercial retrofit program of $3 per MMBtu of fossil gas displaced annually multiplied by the lifetime of the measure being installed. Estimates of the amount of displaced fossil gas will be based on engineering energy models and/or the customer's historical annual average usage over the previous 3-5 years, whichever is more appropriate to fully assess the magnitude of projected fossil fuel savings. BED-C at 42.

22. BED proposes to use any excess TEPF funds—after accounting for traditional projects, advanced manufactured homes, SuperUsers, and commercial custom retrofit programs—to further support Tier 3 or Act 44 programs that focus on thermal energy consumption and/or increasing the efficiency of building space heating. BED November 13 Comments at 4; exh. BED-C at 43.

<u>Act 44 Section 1(b)(1) - Reductions in Greenhouse Gas Emissions</u>

23. BED's proposed Act 44 program activities will reduce greenhouse gas emissions in the thermal energy and transportation sectors. BED November 13 Comments at 8; exh. BED-C at 30, 38, 42.

24. BED proposes to use Act 44 funds to provide additional incentives to all Tier 3 participating customers for greenhouse gas reduction technologies, including electric vehicles, EVSE, and heat pumps. Exh. BED-C at 33-34.

25. BED's transportation programs will reduce greenhouse gas emissions by increasing the adoption of electric vehicles in its service territory. This is accomplished by addressing market barriers and gaps to accelerate Vermont's shift to electric-based transportation from fossil-fuel-based transportation. Exh. BED-C at 30.

26. BED anticipates Tier 3 program participation will increase due to Act 44 incentives. Without Act 44 funding for enhanced incentives, BED estimates that participation in its transportation and ductless heat pump programs will be 20-25% lower. Exh. BED-C at 33.

27. BED estimates that the additional $300 for a new all-electric vehicle (market rate) will increase Tier 3 participation from a projected 252 rebates to a projected 315 by 2026, thus increasing greenhouse gas reductions from transportation. Exh. BED-C at 33.

28. BED estimates that its proposed custom commercial retrofit program will reduce emissions by as much as 2,600 tons of CO_2e, assuming the average project displaces 1,100 MMBtus annually and the replaced equipment has 10 remaining years of service, on average. Exh. BED-C at 43.

29. BED's Thermal Energy and Process Fuel ("TEPF") expected savings are estimated to increase from the approved DRP with the addition of the SuperUsers and custom commercial retrofit programs.

Approved DRP TEPF Savings (MMBtus)	**2024**	**2025**	**2026**	**Total**
Residential	140	122	112	374
Commercial	15	13	12	40
Vermod	175	175	175	525
Total	330	330	330	939

Revised Plan B TEPF Savings (MMBtus)	**2024**	**2025**	**2026**	**Total**
Residential	140	122	112	374
Commercial	15	13	12	40
Vermod	137	137	137	411
SuperUsers Program	6,626	6,626	6,626	19,879
Custom Commercial Retrofit Program	45,232	45,232	45,232	135,696
Total	52,150	52,130	52,119	156,400

BED November 13 Comments at 5-6.

Act 44 Section 1(b)(2) - Nexus with Electricity Usage

30. BED's proposed Act 44 programs will have a nexus with electricity usage. Exh. BED-C at 30.

31. BED's proposed Act 44 transportation sector programs have a nexus with electricity usage because they promote the use of electric vehicles over fossil-fuel combustion vehicles. The programs reduce total fuel consumption and energy costs for consumers by switching their fuel source for transportation. Exh. BED-C at 30, 41.

32. BED's proposed Act 44 heating sector programs have a nexus with electricity usage because they combine weatherization work with the installation of heat pumps, which are an electric-based heating and cooling system. Exh. BED-C at 30-31, 33.

Act 44 Section 1(b)(3) - Relationship with Energy Transformation Projects

33. BED's Act 44 programs are additive and complementary to and do not replace and are not in competition with BED Tier 3 energy transformation projects. Exh. BED-C at 30-33.

34. BED's Act 44 EV and EVSE programs are designed to increase and accelerate adoption of EVs by overcoming market barriers and gaps. BED's proposal includes additional incentives to all Tier 3 participating customers for new and pre-owned EVs and EVSE. To address cost barriers, enhanced incentives will be available for new and pre-owned EVs and EVSE at workplace/retail locations, multifamily housing, and in disadvantaged communities. These incentives are in addition to Tier 3, so BED's proposal does not compete with existing Tier 3 programs. Exh. BED-C at 13, 30, 32.

35. BED proposes to support up to three DeltaClime events that increase general market awareness about the benefits of driving electric vehicles and foster the development of novel and commercially available technologies that may otherwise be overlooked by the public. These events encourage market transformation and Tier 3 programs. Exh. BED-C at 30.

36. BED's Act 44 heating sector programs will be additive to its Tier 3 programs and will combine thermal efficiency with heating electrification for low- to moderate-income customers. Exh. BED-C at 30, 33.

37. BED's GeoTesting proposal is additive to Tier 3. BED proposes to offer incentives to commercial building owners or developers for drilling a test well, which will encourage and promote the development of geothermal systems. Exh. BED-C at 32.

Act 44 Section 1(b)(4) - Consultation with Relevant State Agencies

38. BED consulted with the Department to ensure that its proposed Act 44 activities will not be duplicative or in competition with programs delivered by State agencies or departments. Exh. BED-C at 5.

39. BED's thermal programs are coordinated with Efficiency Vermont, Vermont Gas Systems, Inc., and others. BED-C at 19, 39-40.

Act 44 Section 1(b)(5) - Delivery on Statewide Basis

40. Section 1(b)(5) of Act 44 does not apply to BED because BED is only required to deliver its efficiency programs, including Act 44 programs, within its service territory. Exh. BED-C at 1.

Act 44 Section 1(c) - Cooperation with Retail Electricity Provider

41. BED is the distribution utility providing retail electricity in the same service territory as the proposed Act 44 programs. Thus, BED's Act 44 programs are coordinated with the retail electricity provider. Exh. BED-C at 30, 33.

Act 44 Section 1(c)(1) - Savings and Reductions Claims

42. BED will not claim any savings, reductions in fossil-fuel consumption, or reductions in greenhouse gas emissions resulting from measures that are part of BED's Tier 3 compliance. BED December 22 Response at 7.

Act 44 Section 1(c)(2) - Evaluation and Measurement

43. The Department is the appropriate entity to evaluate BED's Act 44 programs. The Department's approved evaluation plan and budgets include $15,000 for BED's Act 44 activities in the 2024-2026 performance period. Exh. BED-C at 6.

44. To monitor its Act 44 programs, BED will track and report on its activities on an annual basis during the 2024-2026 performance period. Exh. BED-C at 43.

45. BED's Act 44 program activities will be provided in its 2024-2026 Triennial Plan, with annual updates to the triennial plan and regular reporting through quarterly and annual reports. Exh. BED-C at 29.

Rate and Bill Impacts

46. BED's revised DRP proposal is modeled to have average 20-year rate and bill impacts as indicated in the following.

Customer Class	Rate Impacts	Bill Impacts
Residential	4.04%	3.25%
Commercial	1.36%	0.14%
All Customers	2.16%	1.07%

Exh. BED-C at 46.

47. Comparing BED's approved DRP to the Act 44 proposal, the estimated rate and bill impact analysis shows that the overall impact on rates for residential customers across the 20-year period decreases from 4.5% to 4.04% and bill impacts increase from -2.4% to 3.25%. Commercial rates see an increase from 0.0% to 1.36% and an increase in bills from -10.3% to 0.14%. These changes reflect the lower electrical savings the revised portfolio is expected to deliver when shifting the budgets from measures that deliver electrical savings to the proposed Act 44 programs for the transportation and thermal sectors. BED November 13 Comments at 11; exh. BED-C at 46.

<u>Other Impacts</u>

48. BED's Act 44 proposal does not change the budgets and budget categories for electric development and support services activities approved by the Commission for the 2024-2026 performance period. BED November 13 Comments at 4-5; exh. BED-C at 27.

49. BED estimates that its Act 44 proposal will result in the following change to its benefits per MWh saved.

	Approved Plan A	Revised Plan B
Total Resource Acquisition Costs	$7,589,020	$7,589,020
Total Resource Acquisition Benefits	$9,106,824	$8,165,384
Total MWh Savings, including 5% stretch goal	14,254	12,778
Benefits per MWh Saved	**639**	**639**

BED November 13 Comments at 8-9; BED December 15 Comments at 1-2.

50. Due to budget shifts from DRP programs to Act 44 programs, there is a reduction to BED's expected MWh savings by 1,405 MWhs over the performance period when compared to the approved DRP. Income-eligible programs remain unaffected.

Plan A	2024	2025	2026	3 Year Cumulative
Commercial	3,731	3,687	3,719	11,137

Residential	803	760	720	2,283
Income Eligible	26	55	74	155
TOTAL	**4,560**	**4,502**	**4,513**	**13,575**

Revised Plan B TEPF Savings (MMBtus)	**2024**	**2025**	**2026**	**3 Year Cumulative**
Commercial	3,356	3,307	3,337	10,000
Residential	717	670	628	2,015
Income Eligible	26	55	74	155
TOTAL	4,099	4,032	4,039	12,170

BED November 13 Comments at 2; exh. BED-C at 3.

Changes to DRP Performance Goals

51. The shift in spending to Act 44 programs will reduce the savings estimated to be achieved by the electric efficiency programs in the approved DRP. For the 2024-2026 performance period, BED proposes that its QPI targets be adjusted as follows.

QPI #	**Title**	**Approved Plan A**	**Proposed QPI Target**
1	Total resource benefits	$17,104,000	$14,546,000
2	Annual electricity savings	14,254	12,778
3	Summer peak	2.15	1.94
4	Winter peak	2.16	1.95
5	Lifetime electricity savings (MWh)	197,820	176,652
6	Administrative efficiency	$45,679	$43,739

BED November 13 Comments at 9; BED December 15 Comments at 2-3; exh. BED-C at 56.

52. The shift in electric efficiency spending to Act 44 programs also affects the Minimum Performance Requirements. BED proposes the following changes to its MPRs.

MPR#	**Title**	**Approved Plan A**	**Proposed MPR**
1	Electric System Benefits	1.2	1.00
2	Equity for Residential Ratepayers	$1,684,963	$1,484,338
3	Equity for Low Income	$253,237	$253,237
4	Equity for Small Business	2.05	2.05

BED November 13 Comments 9-10; BED December 15 Comments at 1; exhs. BED-C at 58-59 and Plan A (revised 11/3/23).

53. BED's MPR addressing electric system benefits represents a benefit-to-cost ratio, where the present value of electric benefits is used as the numerator, and total energy efficiency charge spending is the denominator. Consistent with the threshold approved for Efficiency Vermont, BED proposes that the requirement has a minimum threshold of 1.0. The amended DRP with the proposed Act 44 programs is estimated to result in a value of approximately 1.08. BED December 15 Comments at 1; exh. BED-C at 58-59.

54. The shift in spending to Act 44 programs will reduce the TEPF QPI target for MMBtu savings as follows.

TEPF QPI # 1	**Approved Plan A**	**Revised Plan B**
Thermal and mechanical energy MMBtu Savings	940	835

Exh. BED-C at 51.

Department Recommendations for BED's Act 44 Programs

55. The Department recommends that the Commission approve BED's Act 44 proposals at budgets that are gradually reduced by 25% each year starting in 2024, except for the DeltaClime and GeoTesting programs. The Department's annual compounding 25% budget reduction results in Act 44 budgets that are 42% less than those proposed by BED over the three-year period. Department December 15 Comments at 1-2.

56. The Department recommends the following budgets for BED's Act 44 programs during the 2024-2026 performance period.

	2024	**2024**	**2026**	**3-Year Total**
Transportation	$61,942	$41,741	$24,463	$128,146
Buildings	$57,285	$38,603	$22,623	$118,512
Special Projects - DeltaClime	$15,000	$16,000	$17,000	$48,000
Special Projects - GeoTesting	$45,000	$45,000	$45,000	$135,000
Preferred Dealer Network	$5,025	$2,161	$0	$7,186
Total	**$184,252**	**$143,505**	**$109,086**	**$436,843**

Department December 15 Comments at 1-2.

57. The Department proposes these budget changes to reflect policy changes and funding in the transportation and thermal sectors and a desire to maintain the financial value that Vermonters receive from electric efficiency programs. Policy changes and funding include ther Vermont Agency of Natural Resources' ("ANR") Advanced Clean Cars ("ACC") and Advanced Clean Trucks ("ACT") Rules, VTrans incentives and programs, the Internal Revenue Service ("IRS") tax credits, and Agency of Commerce and Community Development ("ACCD") vehicle charging programs. Department December 15 Comments at 2-5.

58. The ACC and ACT Rules were adopted by the ANR in December 2022, along with other rules requiring additional electric vehicle deliveries in medium- and heavy-duty categories and requiring automobile manufacturers to sell growing shares of electric vehicles. Beginning in model year 2026 (which begins when new vehicles are sold during calendar year 2025), these rules will require manufacturers to produce and deliver for sale an increasing percentage of zero-emission cars, trucks, and buses annually through 2035. Department December 15 Comments at 3-4.

59. VTrans has $12 million in funds available for incentives for new electric vehicles for income-qualified individuals who purchase or lease an electric vehicle. VTrans' "electrify your fleet" program has $500,000 available to support commercial, municipal, and nonprofit fleet owners purchasing electric vehicles, including off-road vehicles. VTrans' contract with Drive Electric Vermont provides technical assistance to State agencies, fleet managers, and electric vehicle charging hosts. Department December 15 Comments at 4-5.

60. The IRS's plug-in electric drive motor vehicle credit and used clean vehicle credit provide tax credits for new and used electric vehicles, respectively. The IRS has a commercial clean vehicle tax credit for qualified vehicles for both businesses and tax-exempt organizations. The IRS's alternative fuel infrastructure tax credit of 30% applies in various non-urban, low-income, and high-poverty census tracts. Department December 15 Comments at 4-5.

61. ACCD's "workplaces and community attractions" charging grant has $3.6 million available to support EVSE for Vermont employees, residents, and tourists in downtowns and other oft-visited locations. ACCD's multi-unit dwelling electric vehicle charging grant has $2.7 million to add Level 2 chargers at multifamily housing locations to serve residents. Department December 15 Comments at 4-5.

62. RES Tier 3 incentives, offered by nearly all distribution utilities including BED, provide incentives for all-electric vehicles and plug-in hybrid vehicles, many of which include both new and pre-owned vehicles. Tier 3 incentives and discounted rates provide upfront rebates and lower operational costs for managed electric vehicle charging. Department December 15 Comments at 4-5.

63. Inflation Reduction Act ("IRA")-funded home efficiency rebates and the home electrification and appliance rebates programs will begin implementation during the 2024-2026 performance period. These federally funded programs will bring $59 million to Vermont to support thermal efficiency and electrification. Department December 15 Comments at 5.

64. The Department consulted with the State agencies mentioned above in developing its proposal to reduce the Act 44 budgets, including ANR, VTrans, and ACCD. Department December 15 Comments at 2-5.

Discussion

As discussed below, I recommend that the Commission approve BED's proposed DRP amendments for the first year of the 2024-2026 performance period to allow for the implementation of greenhouse gas emission reduction programs as authorized by Act 44 and the DeltaClime and GeoTesting programs for the 2024-2026 performance period. For the second and third year of the performance period, I recommend the Commission allow for further process to allow BED and the Department to examine the tradeoffs of the proposed programs and budget levels for years two and three.

Act 44 was enacted to permit the continuation of the pilot greenhouse gas reduction programs first authorized under Act 151 in 2020 for the 2021-2023 performance period into the 2024-2026 performance period. BED proposes to spend approximately $758,991 of its approved electric resource-acquisition budgets along with up to $600,000 from its TEPF budgets for the 2024-2026 performance period on the delivery of Act 44 programs in the transportation and heating sectors. BED's proposal includes the continuation and refinement of its activities authorized by Act 151. Specifically, BED proposes to enhance incentive programs to accelerate Tier 3 measure adoption by providing BED customers with additional incentives to reduce upfront capital costs even more and increase the cost competitiveness of beneficial electrification technologies. BED also proposes to address cost barriers of geothermal heating and cooling by providing incentives for test wells that determine the potential of geothermal as a building's primary heating and cooling system. In addition, using TEPF funds, BED proposes two new programs: the SuperUsers program and the Commercial Custom Retrofit program. The SuperUsers program focuses on encouraging customers who consume a large volume of fuel annually for transportation to transition to all-electric vehicles and install EVSE. The Commercial Custom Retrofit program will encourage electrification retrofits for commercial customers that exceed current energy codes.

The Department recommends that the budgets for BED's Act 44 programs, except for the DeltaClime and GeoTesting programs, be reduced by $322,148, which represents an annual compounding 25% reduction that results in budgets that are 42% less than those proposed by BED over the 2024-2026 performance period. Further, the Department contends that the collective goal should be to phase out funding for Act 44 activities over the upcoming performance period.[5] The Department argues that its proposed Act 44 budget reductions reflect significant policy changes and funding since the passage of Act 151 in 2020 that are aimed at accelerating greenhouse gas emission reductions in the transportation and thermal sectors.[6]

The Department maintains the ACC and ACT Rules will require automobile manufacturers to sell growing shares of electric vehicles starting in calendar year 2025, and that the proposed funding for Act 44 transportation initiatives may displace investment that manufacturers or dealers would otherwise make anyway.[7] Separately, VTrans and ACCD have made available significant funds to encourage electric vehicle purchases and improve charging infrastructure around the state. At the federal level, the IRS provides tax credits to encourage the same activities.[8] In addition, the Department notes that existing Tier 3 programs remain in place with the clear objective to reduce greenhouse gas emissions from fossil fuels.[9]

With respect to the heating sector programs, the Department notes the recently enacted Clean Heat Standard is aimed at meeting the thermal sector's share of greenhouse gas reduction requirements in accordance with the Global Warming Solutions Act and is expected to bring significant financial resources to decarbonize the thermal sector.[10] The Department also notes that IRA-funded rebates directed at Vermont will enable thermal efficiency and electrification

[5] Department December 15 Comments at 1-2.
[6] Department December 15 Comments at 2-5.
[7] Department December 15 Comments at 4-5.
[8] Department December 15 Comments at 4-5.
[9] Department December 15 Comments at 4-5.
[10] Department December 15 Comments at 5.

during the 2024-2026 performance period.[11] In addition, the Department contends that the Commission in a recent decision has encouraged the distribution utilities to increase their Tier 3 spending in the low-income sector and as a result expects an increase in programs and incentives designed to serve these customers.[12]

Given the collective policy changes, funding opportunities, and performance requirements on entities in both the thermal and transportation sectors, the Department maintains there is a reduced need for the electric energy efficiency charge to fund Act 44 programs in the 2024-2026 performance period. While the Department does not dispute that the programs and incentives proposed by BED have value to customers, the Department contends that the electric energy efficiency charge is not the most appropriate funding mechanism for many of the proposed Act 44 incentives because funding these programs with the energy efficiency charge diverts funds from core electric efficiency programs that deliver electric system benefits.[13] The Department argues that BED should be approaching the upcoming performance period with the intent of winding down Act 44 programs or securing alternative funding to support them.[14] The Department maintains that its recommended ramp-down preserves some of the energy efficiency charge funds to be invested as originally intended – i.e., to generate electric system benefits – and that over the long term, robust electric system benefits will make a transition to electrifying heating and transportation end-uses more affordable for Vermonters.[15]

With respect to the Section 1(b) criteria that must be met for an EEU to expend energy efficiency charge funds on Act 44 activities, the Department agrees that BED's measures and proposals will support greenhouse gas reductions in the transportation and thermal sectors and have a nexus with electricity usage, as required by Sections 1(b)(1) and (2).[16]

With respect to the Section 1(b)(3), the Department contends that most of the spending in BED's Act 44 proposal is for measures that should be funded under Tier 3 programs and that using energy efficiency charge funds to provide customer incentives for electric vehicles and heat pumps reduces the investment that distribution utilities might otherwise make for those Tier

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[11] Department December 15 Comments at 5.
[12] *See* Case No. 22-4421-INV, Order of 11/29/23; Department December 15 Comments at 5.
[13] Department December 15 Comments at 7-8.
[14] Department December 15 Comments at 5-6.
[15] Department December 15 Comments at 6.
[16] Department December 15 Comments at 6.

3 measures.[17] Because Act 44 requires the diversion of funds away from cost-effective efficiency programs that have already received Commission approval in this DRP proceeding, the Department maintains that any funding proposals should be designed to strategically fill gaps that are not likely to be met through other programs. The Department supports BED's GeoTesting as an appropriate use of Act 44 funds as it fills a funding gap to deploy greenhouse gas reduction technology that would be difficult to accommodate within BED's Tier 3 budgets.[18] BED's DeltaClime is another area the Department supports and believes it may help build a market for emerging technologies and funding can be phased out once the market matures.[19]

The Department maintains that the Section 1(b)(3) requirement that Act 44 measures and programs "result in the largest possible greenhouse gas emissions reductions in a cost-effective manner" has proven difficult to demonstrate because the statute prohibits claiming fossil fuel and greenhouse gas reductions associated with measures for which a Tier 3 program is already claiming these savings. This complexity is most apparent when Act 44 funds are used simply to augment Tier 3 incentives.[20] The Department further maintains that it is challenging to evaluate whether the Act 44 proposal will yield the "largest possible greenhouse gas emissions reductions" because BED does not present a justification for why the specific activities were selected in comparison to alternatives.[21]

With respect to Section 1(b)(4) requirements, the Department raises the concern that Act 44 activities overlap with Tier 3 activities and that policy changes in the transportation sector have lessened the justification for EEU spending in this arena.[22] With respect to the Section (1)(b)(5) requirements, the Department notes this provision applies to Efficiency Vermont because it provides statewide services.[23]

While noting there are benefits to BED's Act 44 proposal, the Department points out that the diversion of energy efficiency charge funds means that the benefits from traditional electric EEU programs have been reduced. The Department raises concerns that BED's proposal reduces the expected savings from the electric portfolio, including reductions in total resource benefits,

[17] Department December 15 Comments at 7.
[18] Department December 15 Comments at 7.
[19] Department December 15 Comments at 7.
[20] Department December 15 Comments at 8.
[21] Department December 15 Comments at 8.
[22] Department December 15 Comments at 8-9.
[23] Department December 15 Comments at 9.

annual and lifetime MWh savings, and summer and winter peak savings. The Department also raises concerns about the electric system benefit MPR and ensuring ratepayer cost-effectiveness.[24] Given these tradeoffs, the Department argues that its recommended budgets are the appropriate funding for these programs.

BED disagrees with the Department's determinations. BED contends that the Department's proposal to reduce BED's Act 44 program budgets is in direct conflict with the legislative intent and language of Act 44 and underscores that Act 44 was signed into law less than seven months ago to renew and expand Act 151.[25] BED states that the Legislature was fully aware of the pending state and federal programs the Department references, yet the Legislature renewed the authorization to dedicate a portion of energy efficiency charge funds towards emission reduction efforts.[26] Moreover, the Legislature also established authority in Act 44 for BED to use TEPF funds towards targeted programs that reduce gasoline consumption among consumers with very high consumption and increase thermal savings in construction.[27] Finally, BED believes that the Department is adding requirements and regulatory process that should have been discussed with the Legislature, as it is the appropriate venue for policy discussion concerning the use of the energy efficiency charge through Act 44. BED contends that the Department's recommendations to phase out or restrict EEU funds should be disregarded because the Legislature did not give authority to the Commission to impose such restrictions.[28]

BED notes that shifting costs from the EEU's Act 44 budget to Tier 3 burdens the electrical utilities with high Tier 3 costs, adversely impacting electric utility rate competitiveness, especially in BED's case where heat pump installations compete directly with natural gas rates.[29]

BED maintains that the IRA provides limited access to electric vehicle tax credits due to restrictions on eligibility that did not exist in the prior tax credits and because higher interest rates are negatively impacting affordability and the consumer financing and purchasing of electric vehicles and other clean energy technologies.[30]

[24] Department December 15 Comments at 9-10, 12.
[25] BED December 22 Response to Department Comments at 1.
[26] BED December 22 Response to Department Comments at 1.
[27] BED December 22 Response to Department Comments at 1-2.
[28] BED December 22 Response to Department Comments at 1-2.
[29] BED December 22 Response to Department Comments at 3.
[30] BED December 22 Response to Department Comments at 3.

BED maintains that the heating sector remains a challenge to decarbonize as operational costs for heat pumps are still more expensive than those for natural gas heating, so providing incentives that reduce upfront costs remains BED's primary tool in the residential heating sector. BED reports that the number of heat pump units being installed in Burlington has slowed over the last two years.[31]

BED states that Vermont is not on track to meet its climate goals, so reducing Act 44 opportunities due to the potential of other funding opportunities becoming available is not prudent or consistent with the intent of legislation to accelerate progress toward Vermont's climate goals.[32]

BED asserts that electrification is a more effective means of lowering greenhouse gas emissions than electric efficiency. BED believes the Tier 3 programs with complementary incentives from Act 44 are more effective in reducing emissions than some of its EEU programs and allow BED to more effectively advance Vermont's clean energy policy goals.[33]

As demonstrated in the findings above, and as required by Section 1(a) of Act 44, BED is an EEU whose electric resource-acquisition budgets for the 2024-2026 performance period have been approved by the Commission pursuant to 30 V.S.A. § 209(d)(3)(B) and do not exceed its 2021-2023 performance period electric resource-acquisition budgets. Consistent with the requirements of Section 1(a), for the 2024-2026 performance period, BED proposes to reallocate approximately $758,991 of its approved electric resource-acquisition budgets and, pursuant to Section 1(c)(f), up to $600,000 of TEPF funds on programs, measures, and services that reduce greenhouse gas emissions in the thermal energy or transportation sectors.

Section 1(b) of Act 44 requires the Commission to authorize a qualifying EEU to spend its electric resource-acquisition budgets, in an amount to be determined by the Commission but not to exceed $2,000,000 per year, on programs, measures, and services that reduce greenhouse gas emissions if the criteria of Sections 1(b)(1) through (5) are met. Thus, the Commission is assigned the responsibility of determining the budget level at which Act 44 programs should be funded, given its insight into the process completed under 30 V.S.A. § 209(d)(2)(A). Evaluating

[31] BED December 22 Response to Department Comments at 3.
[32] BED December 22 Response to Department Comments at 3.
[33] BED December 22 Response to Department Comments at 5.

trade-offs should be a key consideration in determining Act 44 budgets, just as it is a key consideration in establishing EEU budgets overall.

As demonstrated in the findings above, and as supported by the filings of the Department and BED, BED proposes amendments to its approved DRP to include programs, measures, and services that meet the requirements of Sections 1(b)(1), (2), and (4). Thus, BED proposes amendments that: reduce greenhouse gas emissions in the thermal energy or transportation sectors, or both; have a nexus with electricity usage; and were proposed after consulting with relevant State agencies or departments and will not be duplicative or in competition with programs delivered by that agency or department.

With respect to Section 1(b)(3), the Department argues that BED has not adequately demonstrated that its proposed Act 44 programs are additive and complementary to, and do not replace or compete with, electric distribution utility energy transformation projects implemented pursuant to 30 V.S.A. § 8005(a)(3), such that they result in the largest possible greenhouse gas emission reductions in a cost-effective manner. To address this concern, the Department recommends that the Commission approve most of BED's Act 44 programs at significantly lower budget levels. As discussed above, the Department maintains that its recommended Act 44 budget reductions reflect significant changes in policy and funding since the passage of Act 151 in 2020 and allows the continuation of these beneficial programs while new policy initiatives are in their beginning phases of implementation and alternative funding sources can be identified.

I recommend that the Commission not approve the Department's recommended budget changes. As represented in BED's response, the Department's recommendations for budget reductions and the phase-out of funding are inconsistent with the history and directives established under Act 44. In addition, most of the policy changes and alternative funding identified by the Department do not take effect in 2024, thus creating a potential gap in the implementation of Act 44 activities. Further, the Department's proposal does not include information on how the proposal can or should be implemented, information on how the initiatives can effectively be scaled, or a reasonable program description for the Commission to review and understand the tradeoffs. Unlike BED, the Department has not provided resource-acquisition modeling or other documentation to demonstrate the tradeoffs, including whether its proposed budgets significantly improve the expected savings of BED's electric and TEPF portfolios.

As demonstrated in the findings above and the filings made by BED, BED's proposed Act 44 programs are additive and complementary to, and do not replace or compete with its Tier 3 programs. However, I share the Department's concern that BED's proposal reduces the expected savings from the electric portfolio, including reductions in total resource benefits, annual and lifetime MWh savings, and summer and winter peak savings, and the expected TEPF MMBtus savings. Given the policy changes and alternative funding identified by the Department to take effect in 2025 and 2026, I remain concerned that BED's proposed Act 44 activities for these years may not result in the largest possible greenhouse gas emission reductions in a cost-effective manner.

Accordingly, I recommend that the Commission approve BED's proposed Act 44 programs and budgets for the 2024 performance year and the DeltaClime and GeoTesting programs for the 2024-2026 performance period. I also recommend that further process be conducted in this proceeding to allow BED and the Department to further examine the tradeoffs for the 2025 and 2026 performance years. I recommend that the Commission make its determinations on BED's Act 44 programs for the years 2025 and 2026 after this process is completed. These recommendations help avoid a potential gap in the implementation of Act 44 activities and help ensure the statutory intent that BED's Act 44 programs result in the largest possible greenhouse gas emission reductions in a cost-effective manner.

Within 60 days of this Order, I recommend that BED be required to make additional filings examining the tradeoffs of its Act 44 proposal for the 2025 and 2026 performance years, including examining budget reductions or other program changes that improve expected savings from the electric and TEPF portfolios. I also recommend that the Department be provided with the opportunity to make additional filings examining the tradeoffs of its Act 44 budget proposals.

BED will report on its Act 44 program efforts through the triennial plan proceedings. The Commission has scheduled the review of the triennial plan for the 2024-2026 performance period in Case No. 23-4102-INV. The triennial plan review will include the DRP amendments approved by the Commission.

As discussed in the findings above, and as required by Section 1(c)(2) of Act 44, the Department will evaluate BED's Act 44 programs. In an October 2, 2023, Order is this proceeding, the Commission approved the Department's evaluation plan and budgets for the 2024-2026 performance period. If the Commission's determinations on this proposal for decision affect the approved evaluation plan and budgets, the Department should make a filing in this proceeding to propose changes for Commission approval.

Finally, I recommend that the Commission approve the proposed changes made to BED's electric and TEPF QPI targets to reflect the implementation of its Act 44 programs. The electric and TEPF QPI targets I recommend the Commission approve for the 2024-2026 performance period are contained in the tables in BED's December 15 Comments. I note that the QPI targets and corresponding tables may need future changes and approvals by the Commission based on the future process recommended in this proposal for decision. Given that I recommend that the DeltaClime and GeoTesting programs be approved for the entire performance period and that it would be difficult to separate the impacts of these programs from the QPI targets, I recommend approval of the QPI targets across all three years rather than just for 2024.

IV. CONCLUSION

In this proposal for decision, I recommend that the Commission approve amendments to BED's DRP for the 2024-2026 performance period to allow for the implementation of greenhouse gas emission reduction programs as authorized by Act 44 and the DeltaClime and GeoTesting programs for the 2024-2026 performance period. For years 2025 and 2026 of the performance period, I recommend the Commission allow for further process to examine whether the proposed programs and budget levels result in the largest possible greenhouse gas emission reductions in a cost-effective manner.

This proposal for decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because the Department and BED agreed to schedules in this proceeding that called for a Commission order with no circulated proposal for decision. In addition, I recommend approval of 2024 now, before all questions related to 2025 and 2026 have been resolved, in the interest of avoiding significant gaps in the implementation of Act 44/Act 151 programs. These recommendations are consistent with the December 1, 2023, Order that encouraged participants to propose schedules that expedite the proceeding.[34]

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[34] *See Order Addressing Efficiency Vermont's and Burlington Electric Department's Requests to Extend Act 151 Programs*, Case No. 22-2954-PET, Order of 11/2/23.

Kelly Martone
Hearing Officer

V. Order

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

1. The findings, conclusions, and recommendations of the Hearing Officer are adopted.

2. The City of Burlington Electric Department ("BED") is authorized to use a portion of the funding received through the energy efficiency charge and the funding received for thermal-energy-and-process-fuels programs 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 (2023 Vt., Bien Sess.).

3. The electric and thermal-energy-and-process-fuels resource-acquisition budgets for BED for the 2024-2026 performance period approved in the September 26, 2023, Order are amended to reflect the changes approved in this Order.

4. The electric and thermal-energy-and-process-fuels quantifiable performance indicators and minimum performance requirements for BED for the 2024-2026 performance period are those contained in the tables in BED's comments filed on December 15, 2023.

5. BED must not claim any savings and reductions in fossil-fuel consumption or in greenhouse gas emissions resulting from a program, measure, or service authorized pursuant to this Order if BED elects to offer the program, measure, or service pursuant to 30 V.S.A. § 8005(a)(3).

6. BED must file any updated triennial plan for the 2024-2026 performance period reflecting the amendments to the Demand Resources Plan approved in this Order in Case No. 23-4102-INV, in advance of the workshop scheduled in the case.

7. Within 60 days of the Commission Order, BED must make additional filings examining the tradeoffs of its Act 44 proposal for the 2025 and 2026 performance years, including examining budget reductions or other program changes that improve expected savings from the electric and thermal-energy-and-process-fuels portfolios. The Vermont Department of Public Service is provided with the opportunity to make additional filings examining the tradeoffs of its Act 44 budget proposals.

Dated at Montpelier, Vermont, this 10th day of January, 2024.

Anthony Z. Roisman	)	PUBLIC UTILITY
Margaret Cheney	)	COMMISSION
J. Riley Allen	)	OF VERMONT

OFFICE OF THE CLERK

Filed: January 10, 2024

Attest: ______________________
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.

PUC Case No. 22-2954-PET - SERVICE LIST

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