

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 23-2221-INV

Investigation into the Clean Heat Standard Default Delivery Agent Costs and Quantities	
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Order entered: 09/04/2024

REQUEST FOR INFORMATION

VERMONT CLEAN HEAT STANDARD DEFAULT DELIVERY AGENT

ISSUE DATE: September 4, 2024

QUESTIONS DUE: October 11, 2024

COMMISSION RESPONSES TO QUESTIONS: November 1, 2024

RFI RESPONSES DUE: December 6, 2024

1. Overview

1.1. Purpose

This request for information (“RFI”) is issued by the Public Utility Commission (“Commission”) to gather information concerning the potential appointment of a Default Delivery Agent (“DDA”), pursuant to Act 18 of 2023. Information received by the Commission will be reviewed for purposes of the stated objectives of this RFI, which may include exploration of available services or solutions and how such offerings may meet the needs of the State.

This RFI has three key objectives:

- Provide prospective DDAs with information regarding the Clean Heat Standard, and the timeline and need for an appointment;
- Hone the function of the DDA(s) for the Commission’s eventual appointment; and
- Better understand the marketplace of professional entities and partnerships doing this work both inside and outside of Vermont.

The Commission shall not be held liable for any costs incurred by the entities in preparation of their submission in response to this RFI. **The State will not award a contract directly resulting from this RFI.** This RFI is issued solely for information and planning purposes. Further, this RFI is not a request for proposals (“RFP”); the Commission is not at this time

seeking proposals and will not accept unsolicited proposals. Not responding to this RFI does not preclude any company or person from participating in a future RFP.

1.2. Contact

If you need to contact the Commission regarding this RFI, please email Holly Anderson, Clerk of the Commission, at puc.clerk@vermont.gov.

1.3. Timeline

Request for Information issued: September 6, 2024

Questions about the RFI due: October 11, 2024

Commission responses to questions due: November 1, 2024

RFI responses due: December 6, 2024

The Commission plans to draft a request for proposals using the information in these RFI responses. The Commission's proposed Clean Heat Standard rule will be delivered to the Vermont General Assembly on January 15, 2025. The Legislature will decide whether to enact the Clean Heat Standard ("CHS") during the next legislative session. If the General Assembly approves the Clean Heat Standard with a provision for appointing one or more DDAs, the Commission will appoint one or more DDAs according to the requirements of the enacted legislation. Current statute requires the Commission to approve the first DDA three-year plan and budget by September 1, 2025; the DDA(s) must be appointed or contracted before that date.¹

1.4. Submission details

Each final submission prepared in response to this RFI must include the elements listed below, in the order indicated, as a single PDF document. Respondents may not include additional attachments with their response document. The entity, when presenting a response, must use the following outline and number the pages:

- Cover page, including
 - Response to RFI title
 - Company/entity name
 - Contact person
 - Telephone number
 - Email address
- Responses to questions

Responses must be filed in ePUC, the Commission's online filing and case management system,

¹ Public Act No. 142 (2024 Vt., Adj. Sess.). The document can be found at <https://legislature.vermont.gov/Documents/2024/Docs/ACTS/ACT142/ACT142%20As%20Enacted.pdf>.

in Case No. 23-2221-INV.² Please be advised that all notifications, releases, and addenda associated with this RFI will be issued in Case No. 23-2221-INV. Verbal or written instructions from any other source are not to be considered.

2. Background

2.1. Goals and outcome

The Commission invites respondents to provide information about what constitutes a realistic and practical scope of work for a DDA. The Commission would like to hear from relevant professional entities who are knowledgeable about and interested in managing a program that results in the reduction of fossil fuel use in Vermont's thermal sector under Vermont's Clean Heat Standard. At a minimum, the DDA(s) will support, coordinate, and/or induce the creation of clean heat credits and obtain or receive credits for eventual retirement on behalf of obligated parties.

The Commission is aware of the wide range of ideas and opinions on what DDA(s) should and could do within the potential Clean Heat Standard program. The purpose of this RFI is to learn about what services organizations would be able to deliver if they were selected as a DDA. We are also open to hearing from individuals or organizations who would like to offer their professional opinions, perspectives, and visions for the DDA(s) based on their experience with similar work, even if they are not themselves interested in becoming a DDA. The Commission hopes to receive responses from entities inside and outside of Vermont to distill the various ideas for what a DDA should be into a concise menu of functions that entities can bid on to perform as a DDA under the RFP.

The Commission will use the information provided in the RFI responses to scope an upcoming RFP that will be used to appoint or contract with one or more entities to become the DDA(s) if the Clean Heat Standard is approved by the Vermont General Assembly.

2.2. Background on Vermont's Clean Heat Standard

In 2023, the Vermont General Assembly passed Act 18 of 2023,³ which requires the Commission to provide a Clean Heat Standard rule to the Legislature by January 15, 2025. The Act states that "it is the intent of the General Assembly that the Clean Heat Standard be designed and implemented in a manner that achieves Vermont's thermal sector greenhouse gas emissions reductions necessary to meet the requirements of [the Global Warming Solutions Act of 2020], minimizes costs to customers, protects public health, and recognizes that affordable heating is essential for Vermonters."

The purpose of the CHS is to reduce greenhouse gas emissions from the thermal sector through

² <https://puc.vermont.gov/epuc-information>.

³ The bill as enacted is available at

<https://legislature.vermont.gov/Documents/2024/Docs/ACTS/ACT018/ACT018%20As%20Enacted.pdf>. The relevant sections of the law can also be found at <https://legislature.vermont.gov/statutes/fullchapter/30/094>.

the implementation of clean heat measures. The CHS does this by requiring any company that imports heating fuels for ultimate consumption in Vermont to obtain a certain amount of clean heat credits each year. The CHS calls these companies “obligated parties.”⁴ An obligated party must obtain and then retire (*i.e.*, not sell or save) a certain number of clean heat credits every year based on its share of fossil-based heating fuels delivered into Vermont.⁵ These businesses can deliver clean heat measures themselves, purchase credits from other entities doing that work, or pay a DDA appointed by the Commission to procure the credits they are obligated to retire in any given year. Credits are obtained by trading for them or by delivering clean heat measures such as weatherization, heat pumps, advanced wood heat systems, and biofuels. A clean heat credit is a tradeable, nontangible commodity representing the amount of greenhouse gas reduction attributable to a clean heat measure, which includes activities such as weatherization, installation of an electric heat pump, or delivery of renewable or bio-based fuels. The DDA(s) will work on behalf of obligated parties to help meet the annual clean heat credit requirements.

More information on the Commission’s work on the potential Clean Heat Standard, as well as updates on the Commission’s processes and procedures, can be found on our Clean Heat Standard website at <https://puc.vermont.gov/clean-heat-standard>. The Commission’s work is in ePUC; our work relating to DDA(s) is in Case No. 23-2221-INV.⁶

2.3. Background on Default Delivery Agents

The Commission is required to appoint at least one DDA. The DDA will be responsible for obtaining credits that the DDA will retire on behalf of obligated parties who have contracted with the DDA to satisfy their credit requirements, in whole or in part.⁷ The Commission has determined that the DDA will primarily perform a program-administrative role under a performance-based regulatory structure.⁸ The DDA will serve a crucial role in the Clean Heat Standard program, if adopted by the Legislature, by coordinating the flows of available funds, work, and credit creation and distribution.

The Commission is using this RFI to further refine the scope of work for the DDA. The Commission may appoint or contract with as many DDAs as necessary to cover credit creation for all target populations in all regions in Vermont. The Commission may appoint or contract

⁴ 30 V.S.A. § 8123(12). This also includes any entity that produces, refines, manufactures, or compounds heating fuel within Vermont for ultimate consumption within the state.

⁵ 30 V.S.A. § 8124(a)(2).

⁶ <https://epuc.vermont.gov/?q=node/64/190908/FV-BDIssued-PTL>.

⁷ Public comments on the role, number, and status of Default Delivery Agents for the Potential Clean Heat Standard were requested in December 2023 and summarized in the Commission’s April 2024 order on that topic. See *Order on the Role, Number, and Status of Default Delivery Agent(s) in the Potential Clean Heat Standard Program*, Case No. 23-2221-INV, Order of 04/26/2024.

⁸ See the Commission’s April 26, 2024, order on “the Role, Number, and Status of Default Delivery Agent(s) in the Potential Clean Heat Standard Program” in Case No. 23-2221-INV.

with coalitions of entities that work together to perform all functions of the DDA. The “what we are looking for” section below explains and asks respondents to comment on some other possible functions of a DDA, which may include implementing or coordinating the implementation of clean heat measures, procuring clean heat credits from the parties who own the credits, creating and administering incentive programs to facilitate the implementation of clean heat measures, and helping clean-heat-measure customers get the best available incentives.

2.4. Background on the Vermont heating fuel landscape

Vermont has a total population of approximately 280,000 households in approximately 330,000 housing units.⁹ Vermont has old housing stock, with 25% of homes built in 1939 or earlier and 58% built before 1980. The top four residential heating fuels are fuel oil (including kerosene) at 40.9% of homes; utility natural gas at 18.0%; bottle, tank, or LP gas at 18.2%; and wood at 13.3%.¹⁰

Customers in the residential, commercial, and industrial sectors are served by several hundred entities that sell heating fuel into or in Vermont.¹¹

In the residential sector, the Clean Heat Standard specifies target populations for clean heat incentives, including households with low income (approximately \$61,380 or less for a four-person household married filing jointly) and households with moderate income (between approximately \$61,380 and \$122,760 for a four-person household married filing jointly). Other residential sector populations may also purchase the clean heat measures that will generate clean heat credits under this program and receive incentives to do so. The same is true for entities in the commercial and industrial sectors.

2.5. Background on Obligated Parties

Obligated parties are “regulated natural gas utilities serving customers in Vermont” and, for other heating fuels, the entity that imports heating fuel for ultimate consumption in Vermont or the entity that produces, refines, manufactures, or compounds heating fuel within Vermont for ultimate consumption in Vermont.¹² Obligated-party credit requirements are based on the entity’s proportion of fossil-based heating fuel brought into Vermont relative to all fossil-based heating fuel brought into Vermont each year; each obligated party must obtain credits sufficient to cover its proportionate share of greenhouse gas emission reductions each year. The Commission would set greenhouse gas emission reduction requirements sufficient to enable Vermont to meet its greenhouse gas emission reduction targets.

⁹ Vermont Quick Facts, United States Census Bureau, <https://data.census.gov/profile/Vermont?g=040XX00US50>.

¹⁰ American Community Survey, Table DP04 using 5 year estimates for 2022, United States Census Bureau [https://data.census.gov/table/ACSDP5Y2022.DP04?t=Housing&g=010XX00US\\$0400000&y=2022&d=ACS%205-Year%20Estimates%20Data%20Profiles](https://data.census.gov/table/ACSDP5Y2022.DP04?t=Housing&g=010XX00US$0400000&y=2022&d=ACS%205-Year%20Estimates%20Data%20Profiles).

¹¹ 30 V.S.A. § 8124(b)(1).

¹² 30 V.S.A. § 8123(12).

3. Information Requested

3.1. Who we are looking for

The Commission would like to hear from knowledgeable professionals who work in the areas envisioned for the DDA role, or who plan to transition into those areas imminently. Please respond if your organization currently provides or is interested in providing services such as those described in Sections 2 and 3.2 of this document. Please also respond if you are part of a partnership or coalition of entities that do or are interested in doing the same.

3.2. What we are looking for

What scope of work would be reasonable and enticing for entities to participate in Vermont's clean heat transition by serving as a DDA under the Clean Heat Standard?

The Commission seeks responses to the questions below. The questions are written assuming you will respond by envisioning your organization in the role of DDA. Please provide information on as many of the questions as possible. **You do not need to respond to every question**, but we appreciate your willingness to provide comprehensive and detailed responses. If a listed item is impractical or infeasible for your organization to perform if it were a DDA, please indicate that and explain why.

Alternatively, you could use the broader questions to guide a response that explains how a business model could be adapted to serve as an effective DDA. Such a response could provide a more narrative explanation of how a DDA could meet the basic qualifications and complete different areas of work in line with statutory intent.

Basic Qualifications

1. Statewide service – the statutorily required ability to serve the entire state of Vermont. How could a DDA position itself to serve the entire state of Vermont?
 - a. What partnerships could a DDA pursue to expand service territory? Why might a DDA pursue those partnerships? Would a DDA prefer to select partners itself or have partners designated by the Commission?
 - b. What geographic areas of the state would pose the biggest challenges, and how should a DDA address them?
 - c. Should the Commission allow different DDAs to specialize in different parts of the market? Is the prospect of becoming a DDA more or less appealing if given the opportunity to focus on a single market segment?
2. Familiarity with emission-reducing thermal technologies – what kind of staff, experience, and/or resources would be important for a DDA to have to operate effectively in this space?
 - a. What kinds of personnel should an organization expect to employ as a DDA?

- b. What standards organizations, industry organizations, or government entities could a DDA coordinate with or use resources from to inform its work as a DDA?
3. Statutorily required specific subsectors – statute requires a DDA to create specific programs for multiunit dwellings, condominiums, rental properties, commercial and industrial buildings, and manufactured homes.¹³ How should a DDA address this requirement?

Possible Areas of Work

4. Procuring clean heat credits – the most basic DDA function is procuring clean heat credits to retire on behalf of obligated parties. How could a DDA go about obtaining credits?
 - a. What could a DDA do to coordinate or facilitate the flow of available funds, projects, and workforce to spur credit creation?
 - b. What other ways might a DDA obtain credits?
 - c. What are the biggest challenges a DDA might face in procuring credits?
5. Should the DDA have a role in taking actions that would incentivize clean heat measures? If so, how?
6. Fostering relationships with clean heat measure implementers – how should a DDA expect to interact with clean heat measure implementers such as contractors?
 - a. What kind of implementing entities should a DDA expect to work with regularly?
 - b. What services or incentives should a DDA expect to offer implementers to spur credit creation? What should a DDA expect from implementers that it works with?
 - c. What standards, qualifications, or credentials should a DDA expect, require, or help provide for those entities implementing clean heat measures?
7. Consumer navigation – how should a DDA help households and businesses navigate clean heat measure opportunities?
 - a. What resources should a DDA make available for Vermonters to interact with a DDA and the Clean Heat Standard program?
 - b. Should a DDA help consumers navigate contracting with measure implementers? If so, how?

¹³ 30 V.S.A. § 8125(g).

- c. Should a DDA help consumers maximize federal incentive opportunities? If so, how?
8. Coordinating grants, incentives, and other funding opportunities – how might a DDA help Vermonters maximize the outside funding they can receive for a measure?
 - a. What organizational experience would be relevant to helping Vermonters claim existing federal, state, and other incentives for implementing clean heat measures?
9. Given your answers to the previous questions 5, 6, and 7, where should a DDA focus its efforts? Should a DDA prioritize serving entities implementing clean heat measures, entities receiving clean heat measures, or both?
10. Specific challenges – in addition to financial barriers, there are households that will face special challenges in participating in the Clean Heat Standard program. How should a DDA engage households that face additional barriers to participating in the clean heat transition?
 - a. We have identified three challenges so far: households with limited English proficiency, households living in older buildings, and renters. How should a DDA address each of these situations?
 - b. Are there other challenges that a DDA should prepare to help households overcome to participate in the clean heat standard?
11. Workforce development – statute allows the Commission to approve DDA budgets that include workforce development and market uplift activities. What could a DDA do to achieve market uplift and/or workforce development?
 - a. What market sectors should a DDA target for uplift?
 - b. What challenges might a DDA face concerning market uplift and/or workforce development?
 - c. Is market uplift and/or workforce development something a DDA should plan to do in the early years of the program?
12. Providing incentives – should a DDA offer direct incentives to spur the implementation of clean heat measures? If so:
 - a. To whom should a DDA offer those incentives?

Costs

13. Start-up costs – the current statute does not appear to contemplate initial funding for the DDA.
 - a. How could a DDA's early operations be funded?

- b. How long would it take for payments from obligated parties to fully fund DDA operations?
14. Smoothing costs – the number of credits contracted to a DDA for delivery has the potential to vary significantly from year to year. How could a DDA manage the variability of revenue and required work?
15. Operating costs -- What categories of costs would be included for DDA operation? Examples include credit acquisition, program development, administrative, overhead, and profit. Roughly, what are the appropriate percentages of each category?
 - a. What revenue streams could a DDA depend on to fund its work?

3.3. Next Steps

After responses to this RFI are received, the Commission intends to proceed with an RFP and – if a Clean Heat Standard program is approved by the Legislature – eventually issue an Order of Appointment to one or more organizations to serve as DDA(s). Recognizing the various uncertain timetables for elements related to the appointment and selection of DDA(s), the Commission declines to set out a specific timetable for steps beyond the listed dates for this RFI and the September 1, 2025, statutory deadline for the first round of DDA plans and budgets. The Commission generally expects the DDA RFP to be released sometime this upcoming winter and have responses due during the spring, but will issue more specific information when it is available.

4. Confidential Information

4.1. Unsolicited Confidential Information Prohibited

Entities are hereby expressly directed not to include any confidential information in their responses to this RFI. This RFI does not solicit confidential information. All materials furnished by entities in response to this RFI are subject to disclosure if requested under the Public Records Act and will be posted to the Commission’s public portal, ePUC.

By submitting information in response to this RFI, entities acknowledge and agree to abide by the terms and conditions outlined in this document, including the prohibition on submitting confidential information. This prohibition reduces the burden on the Commission while preventing confidential information from entering the public record.

4.2. Responses Are Public

All information received by the Commission in response to this RFI is subject to Vermont public records law. Responses must be filed in ePUC, a public-facing electronic filing and document portal.

4.3. State Not Responsible for Disclosure of Confidential Information

It is the sole responsibility of the entity responding to this RFI to ensure that no information that should not be publicly disclosed is included in its submitted materials, including any (1) trade secrets or intellectual property, (2) proprietary financial or business information, (3) personal information, or (4) any other information that should not be disclosed to the public. For example, entities should avoid including specific details of their proprietary technologies or methodologies that they consider confidential, and any references to previous client engagements should be presented in a manner that does not disclose the client's confidential information.

5. Appendix

5.1. Relevant statutory citations

Chapter 94 of Title 30 of the Vermont Statutes Annotated addresses DDA function:¹⁴

- Section 8122(c) identifies the primary role of DDA(s) to be the default agent for delivery of clean heat measures on behalf of obligated parties;
- Section 8123(7) defines the role as an entity that provides services that generate such measures;
- Section 8125(a) directs the Commission to provide for the development and implementation of statewide clean heat programs through DDA(s);
- Section 8125(d)(4) directs DDA(s) to directly or indirectly deliver measures to end-use customers;
- Section 8125(e)(1)(b) suggests that DDA(s) may participate in promotion and market uplift, workforce development, and training for clean heat measures as part of its role in the market;
- Section 8125(f) directs the usage of noncompliance funds by DDA(s); and
- Section 8125(g) requires DDA(s) to create specific programs for specific building types.¹⁵


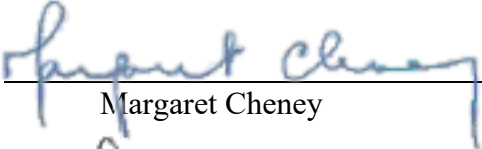
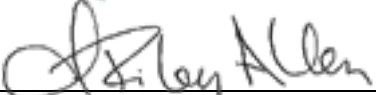
The Clean Heat Standard described in the above statute was created by Act 18 of 2023 and modified by Act 142 of 2024.¹⁶

¹⁴ <https://legislature.vermont.gov/statutes/chapter/30/094>.

¹⁵ See *Order on the Role, Number, and Status of Default Delivery Agent(s) in the Potential Clean Heat Standard Program*, Case No. 23-2221-INV, Order of 04/26/2024 at 3.

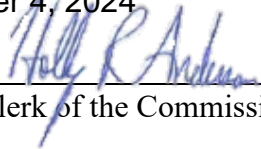
¹⁶ 30 V.S.A. § 8121-8131, Public Act No. 18 (2023 Vt., Bien. Sess.) and Public Act No. 142 (2024 Vt., Adj. Sess.).

Dated at Montpelier, Vermont, this 4th day of September, 2024.

 _____)) PUBLIC UTILITY
Edward McNamara)	
_____)	
 _____)) COMMISSION
Margaret Cheney)	
_____)	
 _____)) OF VERMONT
J. Riley Allen)	

OFFICE OF THE CLERK

Filed: September 4, 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)

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