



**State of Vermont
Public Utility Commission**

MEMORANDUM

To: Participants in Case No. 23-2220-RULE
From: Riley Allen, Commissioner ^{TERA}
Re: Announcing Third Workshop Covering the Economic Impacts of Clean Heat Standard required by Act 18 – Focus on Draft Spreadsheet Model – and Requesting Comments
Date: December 2, 2024

Through this memorandum I am seeking comment on a spreadsheet model that will be made available to the participants by December 11, 2024. As indicated in my October 24, 2024, memo and discussed at the second workshop, the Commission, through its consultants, is developing a model to help meet its obligations to provide the Legislature with estimates of economic impacts from a Clean Heat Standard pursuant to Act 18 of 2023.

The model that we will share with you on December 11 is being developed from an earlier model used in the State's 2023 Thermal Energy Report ("TER"). Like the earlier model, the model that we plan to share is a "bottom-up" platform and reflects our attempt to create a transparent model that could be useful both to the Commission, for its report to the Legislature, and to others in subsequent policy discussions. As noted earlier, the Commission has contracted with Opinion Dynamics to help build on the existing TER model. The Commission is also receiving more limited assistance from Energy Futures Group to help understand the underlying TER model.¹

As a reminder, the initial workshop and comments focused on high-level modeling principles and related guidance. The second workshop focused on real-world variables that should be included in the model or should be considered in relation to the toggles and sliders that will be used to address sensitivities and uncertainties.

The new model will be based largely on the underlying inputs and assumptions used in the original TER model. At a minimum, we expect to modify the potential impacts based on (1) measure characterizations from the work of the Commission's consultant, (2) inputs related to the price and availability of clean fuels, (3) incentive levels reflecting a range of uncertainties for a key cost driver, and (4) any administrative costs associated with distinct policy cases.

The second broad category of key differences in the model relates to the presentation, transparency, and ease of use. Specifically, this model (1) focuses on just two major policy cases (a Clean Heat Standard and an analogous administrative structure to achieve the GWSA targets) and a base case, (2) offers a simplified structure that exists through just one workbook (rather

¹ Energy Futures Group was heavily involved in building the TER model.

than four separate spreadsheet structures that interfaced with the LEAP accounting model), (3) offers an easier-to-use dashboard and an output structure that is intended to make the model more accessible to users, and (4) presents a flexible structure that will allow users to rely on toggles and sliders to modify critical input assumptions, which will allow for flexibility and provide a range of estimated impacts for high, medium, and low-impact scenarios.

In this notice, I'm seeking comments from the participants on the draft model, which we will address at the third workshop, to be held on December 18, 2024, at 1:30 PM. Comments are due by close of business on December 17, 2024. Comments in response to the workshop itself are due by December 23, 2024.

Participants may access the workshop online at <https://meet.goto.com/456512789>, or call in by telephone using the following information: phone number: +1 (571) 317-3116 using access code: 456-512-789. The workshop will be recorded but not transcribed.

Please provide comments on the following broad categories of concern, to be discussed at the workshop.²

First, do the form and structure of the revised model meet the objectives of greater ease and transparent use of the model?

Second, I am particularly interested in comments on the outputs and toggles. The Commission's consultant has attempted to prioritize the sector economic impacts required in Act 18. The consultant has also included sliders and toggles to help with sensitivity analysis and create a range of projected economic impacts. The Commission is seeking guidance on these dimensions of the model.

Finally, and perhaps most importantly, the Commission continues to welcome guidance on the inputs and assumptions discussed to date. Topics of particular interest include the following:

- Price and availability of clean fuel alternatives, especially in the early years.
- Incentive levels applied to weatherization and heat pump technologies for middle-income and market-driven households and businesses.
- Measure mix over time, assuming objectives for least-cost delivery.
- Administrative costs that should be used in relation to a Clean Heat Standard, an administrative framework that meets GWSA targets, or are relevant to a business-as-usual case.

² As indicated in the text, some comments have already been received that will inform the discussion. Further comments should be filed in Case No. 23-2220-RULE. The topic category that we are using for this effort is "9 Other"

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