



## MEMORANDUM

To: Senate Natural Resources and Energy Committee  
From: Darren Springer, General Manager  
Date: April 24, 2019  
Subject: **S. 171**

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Thank you for the opportunity to testify on S. 171. Regretfully I am unable to join the Committee tomorrow morning (Thursday) April 25, but I wanted to share some brief written comments on the proposals in S. 171 for your consideration. My comments relate to Draft number 7, April 19, 2019.

### **Section 1**

With regard to Section 1 of the draft, it appears that Section only addresses funds allocated to Efficiency Vermont, and does not affect Burlington Electric Department's Energy Efficiency Utility (EEU) funds. Burlington Electric provides efficiency services and programs to our customers as an EEU, and under the provisions in Section 1 our programs would not be affected. Assuming nothing in Section 1 would divert funds that are allocated to Burlington Electric ratepayers to other ratepayers, we have no substantive comments to offer on this Section.

### **Section 2**

Section 2 of the draft considers whether to appoint one or more entities to provide an all fuels utility service.

In Burlington, we currently have all fuels utility service through Burlington Electric Department and Vermont Gas Systems. Burlington Electric offers customer incentives and programs for electric energy efficiency to all of our customers as an EEU. Between Burlington Electric's thermal incentives for oil and propane customers, and Vermont Gas Systems' incentives and programs for natural gas customers, all Burlington customers currently have access to thermal energy efficiency programs. In addition, in our role as a distribution utility carrying out Tier 3 programs under the 2015 Vermont Renewable Energy Standard, Burlington Electric offers incentives and programs to reduce fossil fuel use in the heating and transportation sectors, including electric vehicle and plug-in hybrid rebates, electric bus and bike incentives, and cold-climate heat pump incentives.

With that in mind, if the Committee proceeds with examination of an all fuels utility service in Section 2 of the draft, Burlington Electric respectfully recommends that it would not be necessary to have language concerning appointment of a new entity for all fuels efficiency services in Burlington. We believe the current structure of Burlington Electric providing EEU services and Tier

3 incentives, complemented on the thermal side by Vermont Gas Systems EEU services, does not require the appointment of an additional entity to achieve state policy goals.

Our latest data shows that Burlington is using 6.1 percent less electricity than we did in 1989, and that our energy efficiency programs are saving our customers millions of dollars annually. We look forward to continuing to provide a range of services and programs to our customers that support energy efficiency and fossil fuel reduction, and appreciate the Committee's consideration of these comments on S. 171. Please let me know if we can provide any further information or if you have any questions. Thank you.