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January 21, 2026

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 23A-0109 – Green Mountain Power ACRE Pilot 12-Month Update

Dear Ms. Anderson:

Please accept this as the 12-month update to Green Mountain Power’s (GMP) Affordable Community Renewable Energy (ACRE) Pilot. The ACRE Pilot is designed to implement the grant funds awarded to GMP by the Department of Public Service (DPS) to benefit income-eligible customers through the deployment of new solar projects in Vermont.

As previously reported, GMP notified eligible customers of the program in October 2024 and began enrollment for the grant-based credits under the ACRE Pilot in December 2024 as the first solar generation site supporting the ACRE Pilot (Bullfrog Hollow) began commercial operation on December 20, 2024. ACRE bill credits for this project began in January 2025 and are included as “ACRE Program Credit” line item on customers’ monthly energy statements.

Executive Summary

GMP filed ACRE as a pilot due to the temporary source of funding through the federal American Rescue Plan Act of 2021 that must be distributed within a limited period of time and in accordance with requirements established by the Department. The funding was appropriated by the 2021 Vermont General Assembly “to be used on the Affordable Community-Scale Renewable Energy Program, consistent with the parameters of the Clean Energy Development Fund, to support the creation of renewable energy projects for Vermonters with low-income.”¹

Through GMP’s ACRE grant agreement with the Department, GMP is implementing and administering the ACRE Program as an innovative pilot in order to deliver financial benefits via a monthly on-bill credit to income-qualified electric-utility customers from the generation of renewable energy.

¹ Act 74 of 2021 Section G.600 – Climate Action Investments.

For the duration of the grant period, GMP provides regular reports to the Department on activity supported by the grant funds described in the Grant Agreement where we are expected to:

- 1) Contract with eligible community-scale renewable energy generation plants.
- 2) Perform promotion with direct outreach and/or through community partnerships to generate interest in the program.
- 3) Develop enrollment procedures, promotion, and equitable implementation.
- 4) Enroll eligible customers for the temporary ACRE Pilot benefits by using GMP's approved Energy Assistance Program (EAP) to verify income requirements.
- 5) Deliver funded benefits in the form of credits to customers enrolled in the ACRE Pilot on their monthly energy bill.

Summary of Progress to Date & Participation in Pilot

GMP continues to administer ACRE using internal customer datasets and billing processes aligned with the EAP income verification method, consistent with the ACRE grant agreement requirements. GMP has completed purchase agreements for additional solar projects that can support the GMP ACRE grant award. We have finalized customer subscription allocations for these solar projects to ensure full use of grant-funded membership benefits and to support timely credit delivery as those projects come online. We expect customers will be enrolled and notified of their allocations by April this year. These facilities and approximate number of customer ACRE subscriptions and grant allocations are summarized in the table below.

Renewable Development Project listing (with PPAs):

<u>ACRE Array</u>	<u>MW Installed</u>	<u>Commercial Operation</u>
Bullfrog Hollow	4.10 MW	December 2024
I Love Cows	2.47 MW	December 2025
Lowery Road Solar	4.99 MW	December 2025
Hunt Road Solar	4.99 MW	December 2025
Post Road Solar	3.00 MW	December 2025



Image 1: Hunt Road Solar Project in Windsor, VT

Subscription Enrollment and Non-Participating Customers

GMP allocates ACRE benefits consistent with the grant’s membership structure: each participant receives a fixed monthly on-bill credit based on an energy block allocation between 100 kWh and 600 kWh per month in 100 kWh intervals, evaluated using the customers’ average monthly consumption at the time of allocation, rounded to the closest 100 kWh interval.² The credit rate for each rounded allocation unit is \$0.04/kWh and memberships are valid for 60 monthly billing cycles.

The ACRE Pilot leverages the EAP program for income verification to ensure participants meet the requirements of the ACRE grant. As such, enrollment opportunities for ACRE rely on the number of eligible EAP participants. To make it easiest for eligible customers, and to ensure full and timely allocation of grant-funded benefits, we auto-enrolled eligible customers to available ACRE-designated solar projects as soon as subscription capacity became available. Customers are allocated across ACRE projects based on available capacity of the solar project to ensure equitable access within GMP’s service territory. Qualifying customers without smart meters were placed in the ACRE program because they would not be eligible for our other grant-funded solar tariff, Shared Solar, which requires smart meters.

Implementing ACRE as a pilot to pass along known and secure grant funding to qualifying low-income customers presents no cost risk to non-participating customers. The solar projects used for this program are added to GMP’s portfolio based on the same upfront evaluation of the cost and benefits used for all long-term power purchase agreements, at known and fixed prices disclosed and reviewed through Rule 5.200.

² For example, the first 149 kWh/month equals one rounded allocation unit (RAU) and 150–249 kWh/month equals two RAU.



Image 2: Post Road Solar Project in Rutland, VT

Grant Funding Allocation for ACRE Membership Benefits

Under the ACRE grant agreement, the ACRE on-bill credit is funded through a membership budget that is structured in 100-kWh allocation units. Each 100-kWh monthly allocation unit equals a \$4/month bill credit (100 kWh × \$0.04/kWh), or \$240 over the 60-month membership period. ACRE membership funding is divided among participating solar projects in proportion to available generation.

ACRE Array	Customers Allocated	Planned ACRE Membership Funding (5-year, \$)	Status
Bullfrog Hollow	1,187	\$1,301,520	Enrolled/Credits Active
Hunt Road Solar	1,073	\$1,147,499	Allocated
Lowery Road Solar	1,044	\$1,147,499	Allocated
Post Road Solar	625	\$688,637	Allocated
I Love Cows	525	\$568,126	Allocated
Total	4,454	\$4,853,280	

Observations and Looking Ahead

We anticipate fully completing enrollment and expending grant funds under the Grant Agreement before our final Pilot filing update. We will also have more data on customer experience and enrollment from the EAP datasets to evaluate the following questions:

- *Are there alternatives to the GMP EAP screening method to establish participants meet the LMI criteria for eligibility?*

GMP's EAP screening method remains the most efficient and low friction way to confirm that participating customers meet the income eligibility requirements of the ACRE grant. Using EAP also supports consistent program administration because it relies on an established verification process already used for other customer-facing affordability programs.

- *What methods should be considered for transitioning pilot participants to other programs after the 5-year subscription program?*

Looking ahead to the end of the program term, transition planning will include customer experience at the end of the 60-month credit period and whether other program options are available for customers once grant-funded credits expire. For example, we may be able to offer customers the opportunity to move into another solar sharing program, subject to applicable program/tariff capacity and requirements.

Consistent with the Grant Agreement, we continue to support transfers during the membership term (service location transfer within territory, or transfer to another income-qualified customer). GMP will refine this transition plan as the portfolio of ACRE memberships matures and as we evaluate opportunities to reduce administrative overlap across low-income offerings.

- *What methods are working to engage prospective participants in GMP LMI programs?*

Our experience to date indicates that engagement is most successful when enrollment is simple for the customer and relies on existing eligibility verification and billing mechanisms. ACRE's design supports participation by minimizing custom effort once eligibility is confirmed.

- *Are there opportunities to combine the ACRE Pilot with the Shared Solar tariff to reduce overlap between GMP LMI programs?*

Findings from this Pilot, including customer feedback, will help to inform this decision.

Conclusion

These findings reflect the first 12 months of experience under the ACRE Pilot. We will continue the customer notification of enrollment stage of the Pilot through June 2026, when the 18-month pilot term concludes, to deliver the full GMP ACRE grant award. Following full enrollment and the submittal of the final report in August, we will continue to focus on information and subscription tracking for the full 60-month period of each subscription. In addition to our Pilot reporting, GMP submits quarterly and annual ACRE grant reports to the Department tracking the key metrics required in the grant agreement.

Please reach out with any questions.

Sincerely,



Madeline Murray-Clasen

cc: Jim Porter, DPS (*via email and ePUC*)
Peter Walke, Efficiency Vermont (*via email*)
Jonathan Dowds, Renewable Energy Vermont (*via email*)