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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 6-Month Update

Dear Ms. Anderson:

Please accept this as the 6-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 (Department or DPS) to benefit low-income customers through the deployment of new solar projects in Vermont. Green Mountain Power 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 began commercial operation on December 20, 2024.

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 will implement and administer 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.

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.

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

- 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 developed internal customer datasets for ACRE using our updated EAP enrollment and billing processes to support the solar project subscriptions.

In late 2024 we completed customer enrollment for the first project, the Bullfrog Hollow solar facility (seen in Image 1 below), and submitted the first grant reimbursement request. The Bullfrog project’s commercial operation was at the end of December 2024, allowing the first customer payments to begin in January 2025 under this Pilot. Those payments are included as “ACRE Program Credit” line items on customers’ energy statements. For Bullfrog, GMP enrolled approximately 1,200 customers with county level proximity (Rutland, Bennington) using our EAP program dataset. This enrollment represented a planned grant allocation of roughly \$1.3M of GMP’s maximum \$5M award.

Bill Details	
Rate: EAP Discount Rate: E01 Residential	
New Charges/Adjustments	
Customer Charge: 32 Days @ \$0.583	\$18.66
EAP Discount Customer Charge: 32 Days @ \$-0.146	-\$4.67
260 Total KWH @ \$0.19988	\$51.97
EAP Discount of \$-0.04997 on 260 KWH	-\$12.99
Energy Efficiency Charge 260 x \$0.01106	\$2.88
Current Energy/Major Storm Adjustor	\$2.51
Extreme Storm Restoration Fund	\$0.42
Electric Assistance Program Fee	\$1.50
ACRE Program Credit	-\$12.00
New Charges/Adjustments due by 06/23/25	\$48.28

Image 1: Example Customer Energy Statement with ACRE Enrollment

GMP has completed purchase agreements for additional solar projects that can support the GMP ACRE grant award if they reach commercial operation according to schedule. These facilities and commercial statuses are provided below



Image 1: Bullfrog Hollow Solar LLC nearing completion

Expected Renewable Development Project listing (with PPAs):	MW to be Installed	Commercial Operation est.
Bullfrog Hollow	4.10 MW	ONLINE 12/20
Danyow Rd Solar	2.49 MW	Mid 2025
I Love Cows	2.47 MW	Mid 2025
Lowery Road Solar	4.99 MW	Late 2025
Hunt Road Solar	4.99 MW	Late 2025
Post Road Solar	3.00 MW	Late 2025
Barnet Solar	0.90 MW	Late 2025

Subscription Enrollment and Non-Participating Customers

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.

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. Given the 18-month limit on enrollment for innovative pilots and our expectation that the grant will be closed over the next six months, we plan to continue to auto-enroll for upcoming projects and connect eligible EAP participants with their closest solar project to ensure further signups.

Observations and Looking Ahead

By the time of our next pilot filing update, we anticipate completing enrollment under the Grant Agreement. We will also have more data on customer experience and enrollment from the EAP datasets so we will evaluate the following questions:

- Are there alternatives to the GMP EAP screening method to establish participants meet the LMI criteria for eligibility?
- What methods should be considered for transitioning pilot participants to other programs after the 5-year subscription program?
- What methods are working to engage prospective participants in GMP LMI programs?
- Are there opportunities to combine the ACRE pilot with the Shared Solar tariff to reduce overlap between GMP LMI programs?

Conclusion

These findings reflect the first six months of experience under the ACRE Pilot. During the next six months we will continue the allocation stage of the pilot to deliver the full GMP ACRE grant award. Following full allocation, we will focus on information and subscription tracking for the full 60-month period of each subscription. Concurrently, GMP will submit 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*)