

To: House Committee on Energy and Digital Infrastructure
From: James A. Dumont, Esq.
Date: Feb. 4, 2026
Re: H.0753

Thank you for inviting me to provide testimony to the Committee about H.0753.

I have been working on energy equity issues in Vermont on behalf of clients and as a private citizen for two decades. The big-picture lesson I have learned is that without legislative directives, the Public Utility Commission is very unlikely to engage in any meaningful reforms to better protect vulnerable Vermonters.

One can debate whether the reasons for this are legal, political, or something else, but whatever its cause, that inertia is a reality.

The recent report from the PUC, in response to Act 142, is a case in point. The states of New England have the highest energy burden in the country, and Vermont has the weakest protection for low-income electric ratepayers in all of New England. Every other state does significantly better than we do when it comes to protecting low-income electric consumers. The number of disconnections in Vermont is rising, as the Department of Public Service noted in its recent filings with the PUC in connection with the Act 142 report. The DPS said this is a problem we need to investigate.

The PUC's Act 142 report, however, concluded that other ratepayers should not be asked to subsidize low income ratepayers any more than they do now, despite the experience of other states in New England that have programs such as Tiered Discount Programs. The report rejected the DPS's recommendation to investigate how to address this. Instead, the report states that if there is to be any more help for low-income ratepayers in Vermont, the legislature should appropriate funds to subsidize their rates. We all know that this is not going to happen.

The PUC report did not address two substantial reforms that will not impose costs on other ratepayers. One is overhauling the rules governing disconnections. Attorney Karen Lusson from the National Consumer Law Center will address this in some detail.

The other reform has two parts. The first part applies to all utilities in Vermont, private and municipal and coops. Every utility has Service Quality and Reliability Plans, which are submitted to and approved of by the PUC. These deal with subjects like waiting time when a ratepayer calls the office, number of outages, etc. H.753 proposes that among the list of items that must be included in each SQRP is whether in that service territory, disconnections can be reduced and if so, how to do so.

The second part applies only to Investor Owned Utilities. One IOU provides service to about $\frac{3}{4}$ of Vermonters. That utility has an alternative regulation plan. The alt reg plan makes the rate-setting process smoother for utilities and in theory incentivizes them to reduce costs and emissions. H.753 proposes to add reduction in the number of disconnections to the list of goals that are incentivized. That is already the law in Illinois, and Attorney Lusson will address that as well. Again, this costs other ratepayers nothing. But if GMP doesn't make progress, the rate of return that it is allowed could be reduced.

To understand the need for legislative action I want to bring to your attention some data.

In just one winter month in 2025, one out of every six GMP customers received notice of imminent disconnection. Most took whatever drastic steps they could to avoid disconnection—pleading for help from local churches, community action agencies, or the Vermont Parent Child Center (if they have kids at a center), and cutting back on food and medicine (national data shows that families cut back on food and medicine to keep the lights on). In 2025, **hundreds of families** had their electric service cut off because they **owed GMP \$300 or less**. (The GMP data is from GMP's reports to the PUC).

This is true even though GMP has an Energy Assistance Program or EAP, But unlike states such as New Hampshire and Connecticut, GMP provides only a 25% discount, which does little to address the need. The Department hired a consultant to study GMP's EAP in 2018, and the report concluded that only about 30% of eligible customers use the EAP and one reason for that appears to be that the discount is just too small.

Note that the number of disconnections each year by GMP is the same now as it was before it adopted its EAP. We are not making progress.

H.753 is an important step in the right direction.

Thank you.