



February 27, 2026

Dear Chair James and Members of the House Energy & Digital Infrastructure Committee,

At the Chair's request I provide this written testimony to supplement my verbal testimony provided today on February 27th, 2026 in Committee this morning. Burlington Electric Department ("BED") has testified on the subject of extending our efficiency pilot (first granted in 2021 and continued through 2026) on January 23rd, 2026 and again on February 18th, 2026.

Today I testified today on three items - 1. The reasons BED did not previously address the Public Utility Commission ("PUC") Case # 25-1094-INV, 2. The language proposals related to "shall authorize" wording and 3. The weatherization percentage allocations.

First, on the topic of the PUC Case # 25-1094-INV, as I shared today that is not a contested case focused specifically on BED's programs. Rather it is an uncontested case which includes a large number of utilities, efficiency providers and partner organizations, and is broadly focused on improving coordination between Tier 3 programs and efficiency programs. As I shared earlier, BED has not submitted our proposal to extend the efficiency pilot in that PUC docket, because the PUC does not have authority to grant the extension, only the Legislature can do that. Absent legislative action, BED's pilot programs will expire at the end of 2026. BED has not been informed by the PUC how long their proceeding will last or whether our pilots would have already expired by the time it is concluded.

The PUC proceeding referenced has to-date included a workshop where BED staff discussed how we coordinate our efficiency and Tier 3 programs with a lens on equity and with partnerships with CVOEO and others. BED has also submitted a straw proposal in that docket for how to address our traditional TEPF programs during 2027-2029 which touch on oil and propane and unregulated fuel customers.

There is a different PUC docket in which BED's pilot extension proposal has been a major focus and that is our Demand Resource Plan docket, Case # 25-1203-PET, and BED has been open and transparent with the Commission about seeking this legislative pilot extension in that docket. In our 2027-2029 Demand Resource Plan, filed on December 19th, 2025, BED shared with the Commission an extensive plan (called Plan B in this context) for how it would utilize TEPF funds if the pilot was extended, and shared in its cover letter to the Commission dated December 19th, 2025 that BED would seek legislation to continue authorization for this Plan. In my testimony on January 23rd, 2026 I shared with the Committee details of how BED planned to spend those resources as well, drawn from Plan B of our demand resources plan docket submissions. Based on the Committee's request, BED worked with the Department of Public Service ("DPS") and while the current proposal before the Committee represents a departure from BED's original plan (with a significant increase in funding for weatherization), BED believes it is still a workable plan.

Second, I want to address the “shall authorize” language in the committee bill. That concept was not drawn from S. 65 from 2025, but rather is a carryover concept from Act 142 of 2024. The Committee may be aware that there were some significant challenges in getting these pilots implemented during the first several years. That led ultimately to a discussion in Senate Natural Resources and Energy Committee in 2024 for the legislation that became Act 142. During that discussion the PUC suggested to the Committee that they should either give the PUC the authority to allow or disallow the programs through review, or go with a “no review” version which granted the efficiency utilities the ability to proceed without PUC review. Act 142 enacted in 2024 went the “no review” route, and did not require authorization from the PUC for EEU’s to use the funds provided they were within certain guardrails.

BED believes the “shall authorize” language makes clear that the Legislature’s intent is for the PUC to grant BED the ability to fund these programs. The DPS also added proposed language which is included in the committee bill about BED seeking approval from the PUC in our demand resource plan filing, which to be clear BED is doing in Case # 25-1203-PET. BED agrees the PUC should review our proposal to make sure it aligns with the legislatively authorized uses, but that is different from saying the legislature will defer to the PUC about whether BED should even be permitted to pursue these programs. BED defers on this point to Legislative Counsel to provide their interpretation of what the language as drafted, and the PUC proposed changes, would mean relative to implementation.

Lastly, in response to the question from Representative Southworth, BED shared today context for the weatherization investments included in the committee bill. BED is in a unique position where another efficiency utility, VGS, already serves our customers with weatherization services, and they do it well. The 60% allocation for weatherization within this pilot is already a significant increase from the \$150,000 allocated to weatherization initiatives to serve BED and VGS customers during the 2024-2026 timeframe. The 60% allocation means more than a million dollars of TEPF funds will support weatherization and related initiatives during the 2027-2029 timeframe, a nearly seven-fold increase. BED is concerned that further increasing that percentage would squeeze the funds available to support other important programs for our customers, including EV programs and rental property EV charging programs, commercial sector custom programs, and geothermal test wells which have been significantly helpful to our customers. We believe the 60% allocation represents a tough but fair compromise to support increased weatherization and related investments while retaining funds for other important programs as well.

BED appreciates very much the Committee’s time in discussing the extension of our pilot programs, and appreciates as well the DPS work on the committee bill. We are hopeful we can continue to offer these important programs to our customers at a time when federal policy headwinds are severe, and I hope the information we have shared today helps the Committee to further evaluate the merits of our proposal.

Thank you,



Darren Springer

General Manager

Burlington Electric Department