

S. 204, An act relating to electric ratepayer assistance and utility disconnections, “Vermont Energy Equity Law.”

Madame Chair and Committee Members, thank you for providing the opportunity to testify. My name is Carol Flint, and I serve as the Director for Consumer Affairs and Public Information at the Department of Public Service.

Regarding S. 204, the “Vermont Energy Equity Law,” Senator Rebecca White indicated that this bill’s stated purpose is to address energy affordability within the context that Vermonters face an 11% energy burden.

We are focused on affordability. The Department is actively helping Vermonters reduce bills through efficiency efforts and to reduce costs for ratepayers looking forward. There are efforts underway to help utilities save money and avoid costs. My colleague, TJ Poor, with the Department’s Planning Division, could come in to talk about the efforts planned and currently underway.

Disconnections increased by about 31% between April of 2022 and April of 2025. 85% of the disconnections were then reconnected within 15 days. The number of disconnections that were disconnected for more than \$301 past due, increased by 37% between April 2024 and April 2025.

Last September, in case No. 25-0443-PET, which resulted in the Energy Burden report the Department recommended that the Public Utility Commission ask the legislature to authorize the Commission to investigate and, as may be appropriate, implement a statewide, low-income rate program. Prior to implementing a program, the Department strongly believes that additional analysis is needed. We suggest that the Committee consider providing a year to perform that analysis. If the analysis determines that a

program is warranted, then program design and development could be addressed in the following year.

Determining which structures are most appropriate for Vermont will require further investigation of numerous issues such as:

- What discount level will offer meaningful impact to customers with low incomes without shifting too much burden to customers who do not qualify, and what guard rails should be in place to provide balance.
- How should revenue shortfalls associated with the programs be recovered (i.e. statewide or utility-specific jurisdictions, from all customers or just those who do not qualify for the program).
- Is there a specific threshold for electric burden the rates should be striving to achieve and if so, what should the target be.
- How to adjust discount levels over time to account for electrification of the thermal and transportation sectors and the associated increased role the electric sector will play in determining total energy burden for customers.
- Whether discount rates should apply to an entire bill or just a portion of the bill (i.e. a
- minimum amount of use needed to fulfill basic needs with some buffer to encourage conservation).
- What is the best way to manage a program to ensure eligible participants do participate?

A comprehensive review of existing Vermont programs and energy policy is warranted to assess program efficacy, potential synergies between programs, points of under- and over-subscription, cost-effectiveness of programs, and barriers to program success. This review could also examine the cost of State energy policies to identify potential funding sources that might be reallocated to address energy burden.

Absent performing this analysis, we could see unfortunate, unintended, and disparate outcomes that only exacerbate the affordability crisis for some and provide only modest benefits for those most in need.

For these reasons, the Department recommends further investigation of a statewide funding source and necessary program elements to assist low-income customers with their electric bills.

I do have specific comments about S.204 as currently drafted, please. My comments are specific to consumer protections during periods of extreme heat and income eligibility thresholds.

The Department is supportive of curtailing disconnections during periods of extreme heat because of concerns for vulnerable Vermonters. In the past, we have asked electric utilities to voluntarily hold off on disconnects during heat waves. This has been successful.

The U.S. Environmental Protection Agency¹ offers that extreme heat could be defined in a variety of ways and could vary based upon a region's particular climate. However, their interactive maps which paint scenarios for extremely hot days based upon warming temperature trends count extremely hot days as days where the temperature equals or exceeds 95 ° F. Although I was unable to find a dataset for days the temperature equaled or exceeded 95 ° F, I could find data for Burlington for days the temperature equaled or exceeded 90 ° F. Between 2015 and 2019, there were 65 days exceeding 90 ° F and between 2020 and 2025 there were 68 days exceeding 90 ° F indicating a slight warming trend.

Regarding the bill's language which sets income eligibility at 300% of the household federal poverty level, again I point to additional research that could yield best practices for program design, particularly around eligibility thresholds for ease of enrollment, program

¹ [Extreme Heat | US EPA](#)

synergies, and helping to create efficiencies with program screening and eligibility determination.

To conclude, the Department shares your concerns about affordability. We are supportive of a statewide, low-income rate program generally but believe that further analysis and research is needed first.

Thank you for your time and consideration.

Carol Flint, Director, Consumer Affairs and Public Affairs Division

Department of Public Service

2/3/2026