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An act relating to energy efficiency utility jurisdiction

DPS

Alek Antczak

Director, Efficiency and Energy Resources

Intro

Support urgency of climate action

Agree EVT has role to play in GHG emissions reduction efforts

Do not support 65

increase electric rates

increase heating costs for most Vermonters

Agenda

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Affordability

Weatherization vs. GHG Reductions

The Grid

Energy Investments

Cost-Effectiveness

Questions

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Unclear what the limits are

CHS potential study identified program achievable potential ~\$1 billion annual

VT all-in electric costs ~\$950 million annually

No language about affordability

23% for low income is a spending requirement only

fuel switching + higher electric rates = increased energy burden

De-prioritize weatherization

GHG reductions are achieved more cost effectively through liquid fuels and fuel switching

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Weatherization

Participant benefits

Making a home tighter and better insulated will reduce the energy bill

Less GHG savings

GHG

Participant costs

Just because you electrify your space heating doesn't mean your total energy bill goes down (even now, in many cases it goes up)

More GHG savings

EVT Measure List

Portfolio	Measure	Lifetime CO2e (metric tons) per \$ of incentive	Lifetime CO2e Savings per Measure
Electric	Refrigerant leak repair	1.188	1,188
Electric	Custom refrigeration	1.05	1,574
Thermal	Biogas Heating Fuel Switch	0.2664	3,996
Thermal	Industrial Process Heating Efficiency	0.26	1,755
Thermal	Automated Feed Pusher (agriculture)	0.1433	1,433
Thermal	Fuel switch- space heater- wood pellet	0.1319	56
Thermal	Fuel switch- space heater- wood	0.1209	56
Electric	Permanent Refrigerant Leak Detection System	0.1188	1,188
Electric	Variable frequency drive motor control	0.0965	289
Thermal	Biomass Fuel Switch	0.053	530
Electric	Industrial Process Efficient Chiller	0.039	976
Thermal	Unmatched Air Source Heat Pump (TEPF Savings)	0.0368	12.6
Electric	Efficient Refrigeration Rack - Natural Refrigerant	0.0336	3,363
Thermal	Biomass Fuel Switch	0.0323	109
Thermal	Whole-building insulation	0.0213	54
Electric	Ductless variable speed heat pump	0.0202	3.2
Electric	Ducted variable speed heat pump	0.0159	6.3
Thermal	Insulate and air seal	0.0149	38
Electric	Efficient Refrigeration Rack	0.0132	1,316
Electric	Heat Pump Water Heater	0.007	3.6
Thermal	HPwES - 6036HPES (Market Rate)	0.0033	13.4

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Source: Walke, Peter. Testimony of Peter Walke, of Efficiency Vermont on behalf of VEIC, before the Natural Resources and Energy Committee of the Vermont State Senate. March 12, 2025.

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Prioritizing GHG reductions will divert EEC to non-electric efficiency

Force Vermont utilities to procure additional supply at higher cost

Put upward pressure on rates, increase costs for all Vermonters

Prioritizing cost-effective GHG will promote fuel switching and low CI liquid fuels, and deprioritize Weatherization

Concerns about access and equity

Build load, force Vermont utilities to procure additional supply at even higher cost and build expensive infrastructure (no efficiency to mitigate)

High electric rates improves economics of fossil fuel

The Grid

The grid is expensive...

Utility Monopoly Compact

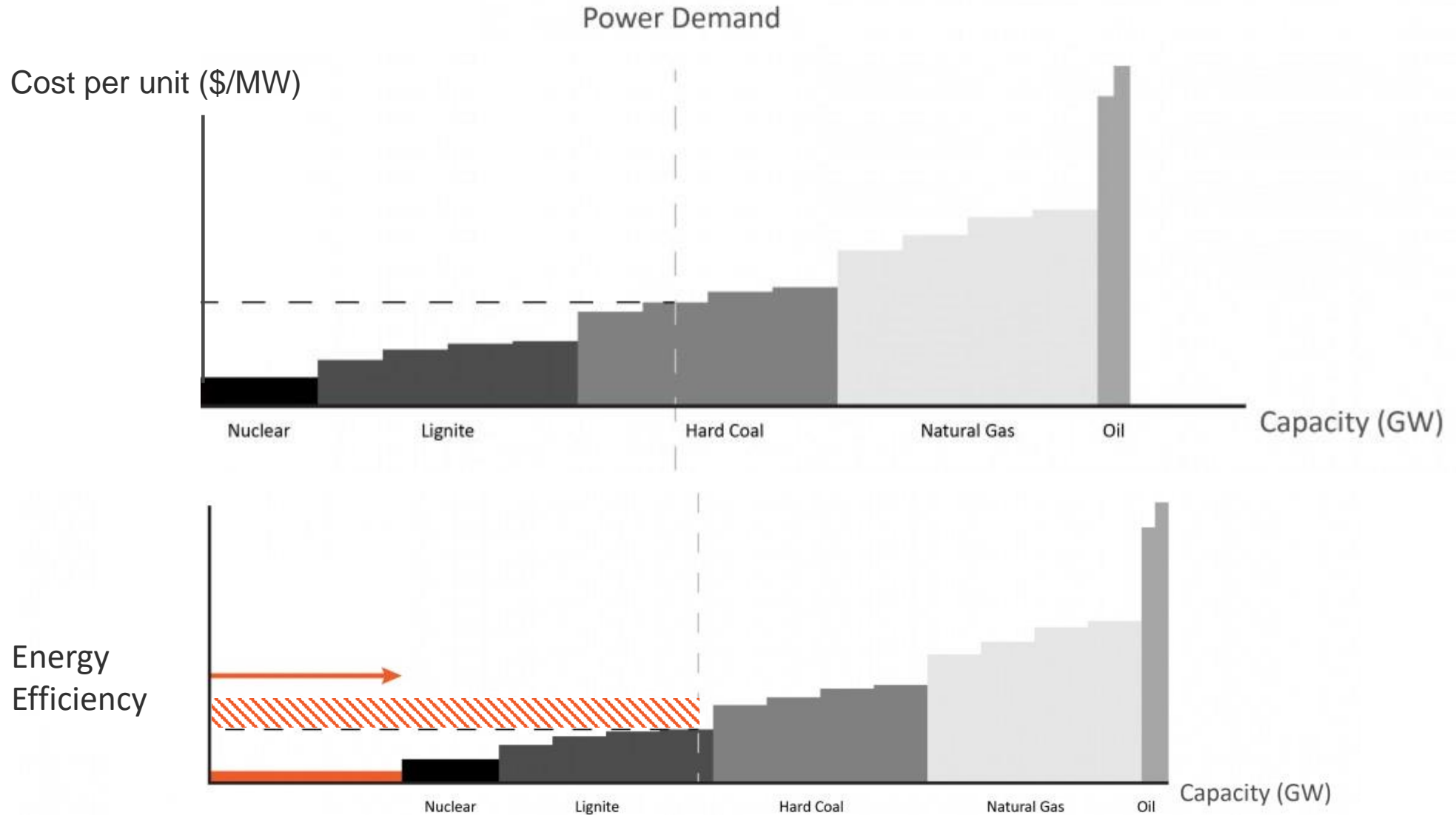
Utilities Get

- Monopoly control of service territory

Utilities Give

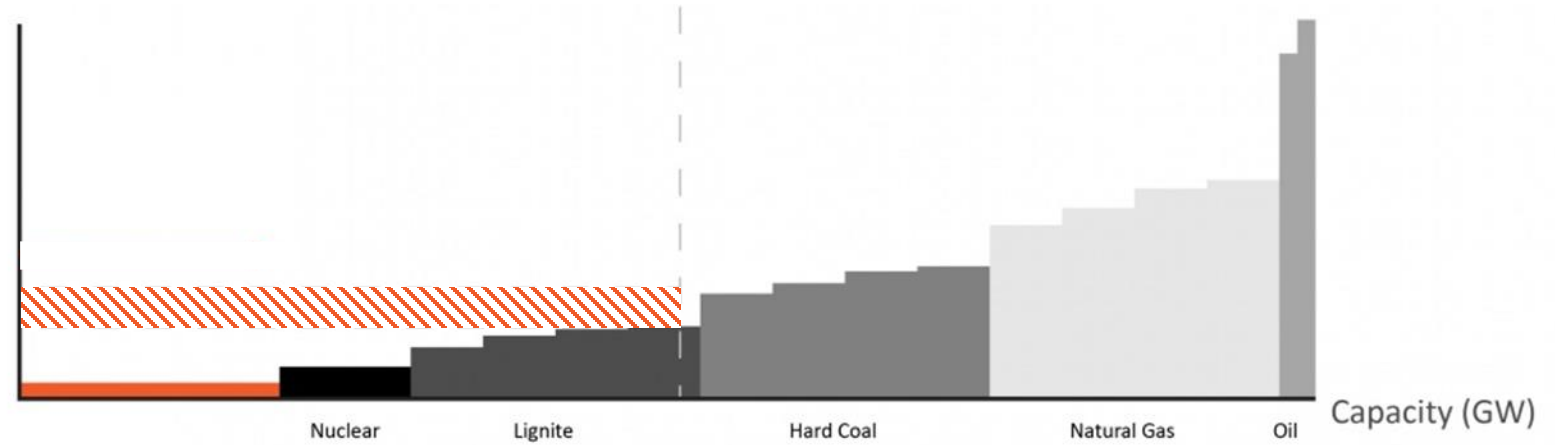
- Reliability
- Non-discriminatory access
- Prudent expenditure

The Grid



The Grid

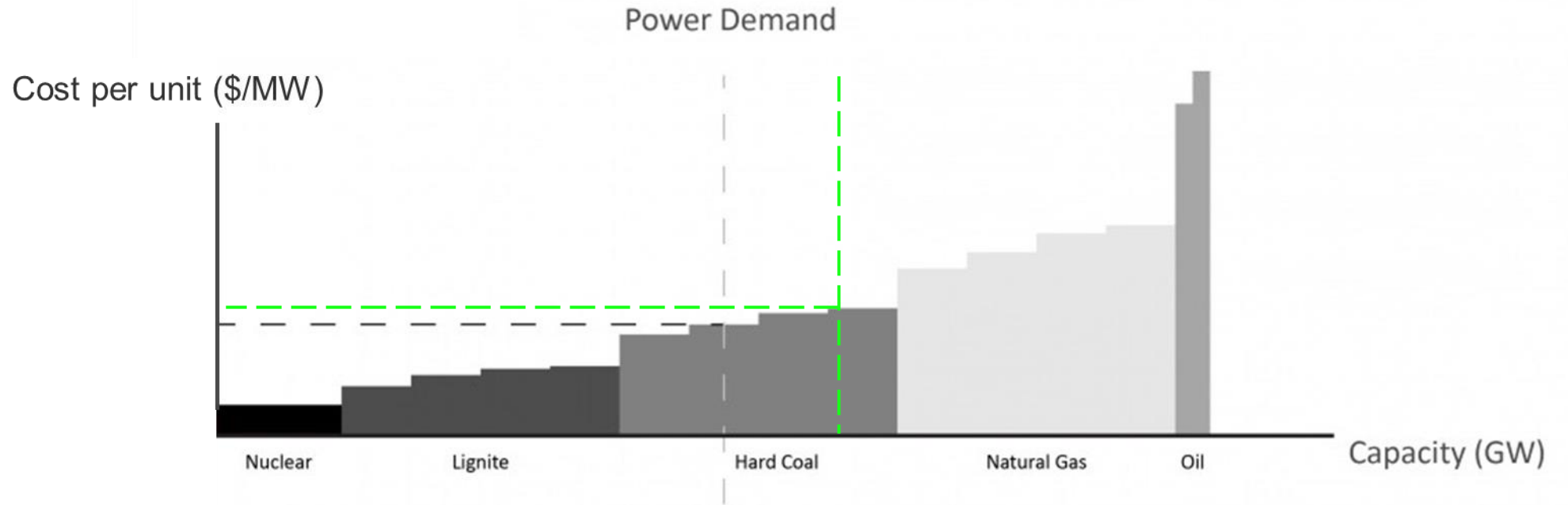
Cost per unit (\$/MW)



Electric efficiency $\$ <$ reduction in supply cost, then it's cost-effective

Downward pressure on electric rates (base rates)

The Grid



Diversion of EEC to non-electric efficiency increases supply need and cost

Electrification drives load building

Upward pressure on rates (base rates)

Unintended
Consequences

Unnecessarily drives costs up for all Vermonters, particularly for the most vulnerable Vermonters

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Making electrification more expensive contravenes purpose of bill

Questions?