



## STOWE ELECTRIC DEPARTMENT

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March 18, 2025

Charlotte Strasser  
Committee Assistant, Senate Finance  
Office of Legislative Operations  
Vermont General Assembly

Re: Town of Stowe Electric Department testimony on S.65

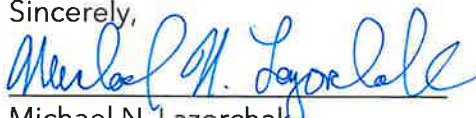
Dear Senate Committee on Finance:

The Town of Stowe Electric Department takes the opportunity to offer the following four points regarding proposed bill S.65.

- ***Reliability & Affordability are the top priorities for Vermonters.*** The Energy Efficiency Charge (EEC) is applied only to electric usage and artificially increases costs for those shifting from fossil fuels to electricity. This sends the wrong price signal as increasing your electricity use means you pay more through the EEC. Fees for funding the energy transition in the home heating and transportation sectors should be tied to fossil fuel usage.
- ***Vermont's RES Tier III already provides a framework for utilities to incentivize fuel shifting and beneficial electrification.*** Creating a similar credit compliance program for EEUs could complicate RES compliance by eroding the DUs ability to meet Tier III requirements and communicate programs clearly to ratepayers. Competition for credits between the EEUs and the DUs creates additional administrative burdens likely to further increase costs for electric ratepayers.
- ***The proposed changes alter the requirement that EEUs collaborate with the utilities.*** The DUs and EEUs have collaborated to develop successful beneficial electrification and weatherization programs that succeed with consistent standards. Deletion of section (D)(vi) means that the EEUs are no longer required to promote their programs in conjunction with demand management strategies offered by the utilities. Expanding EEUs focus to greenhouse gas emissions could alter the cooperative dynamic between the DUs, EEUs, and ratepayers.
- Thorough analysis of this bill's impacts on electric ratepayers **in relation to the outcomes and signals intended** is crucial to avoiding unintended consequences.

Thank you for this opportunity to share our thoughts on S.65.

Sincerely,



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