

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 23-2220-RULE

Proceeding to design the potential Clean Heat Standard	
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Order entered: 02/20/2024

**ORDER REQUESTING INFORMATION ABOUT EXISTING
HEATING AND WEATHERIZATION PROGRAMS**

In Public Act 18 (2023 Vt., Bien. Sess.) (“Act 18”), the Vermont Legislature directed the Vermont Public Utility Commission (“Commission”) to undertake the design of the proposed Clean Heat Standard and to present a proposed rule to the Legislature in January 2025.¹ The intent of Act 18 is that:

“[T]he Clean Heat Standard be designed and implemented in a manner that achieves Vermont’s thermal sector greenhouse gas emissions reductions necessary to meet the requirements of 10 V.S.A. § 578(a)(2) and (3), minimizes costs to customers, protects public health, and recognizes that affordable heating is essential for Vermonters. It shall enhance social equity by prioritizing customers with low income and moderate income and those households with the highest energy burdens. The Clean Heat Standard shall, to the greatest extent possible, maximize the use of available federal funds to deliver clean heat measures.”²

Consistent with that intent, Act 18 directs the public engagement facilitator and Equity Advisory Group to recommend “any additional programs, incentives, or funding needed to support customers with low income and moderate income and organizations that provide social services to Vermonters in affording heating fuel and other heating expenses.”³

To facilitate those efforts to identify additional programs, incentives, and funding, the Commission requests information regarding existing programs, incentives, and funding that currently support customers with low income and moderate income to afford heating expenses, transition to beneficial electrification for heating, reduce fossil fuel consumption for heating, and install weatherization measures. We request the information in the table below, by program, from all entities that currently administer programs and services that help customers with low

¹ For an overview of the work done to date and other information on the proposed Clean Heat Standard, please see the Commission's clean heat website at <https://puc.vermont.gov/clean-heat-standard>.

² 30 V.S.A. § 8121.

³ Public Act No. 18 § 6(b)(3) (2023 Vt., Bien. Sess.) and 30 V.S.A. § 8129(a)(4).

and moderate income with heating. Examples include programs that provide rebates, loans, tax credits, discounts, direct services, and other incentives that support the development, deployment, or subsidization of heating or weatherization. Please submit your comments by Friday, March 15, 2024, and label comments with topic tag “10 – Multiple Topics.”⁴ The Commission has asked Equity Advisory Group members for this information directly and hopes to supplement this information with information from these comments and from entities not directly affiliated with the Equity Advisory Group.

Please provide the following information about each program. The Commission encourages using this table format or the attached Excel file so that we may create a matrix of existing programs. Additional columns may be added for additional programs. If you are aware that a program you administer overlaps with other programs, the Commission would appreciate that information being included in the “other notes” field.


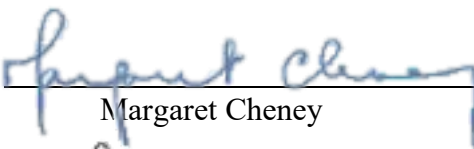
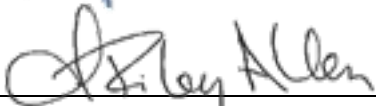
Item	Program 1	Program 2
Program name		
Organization administering program		
Program type (e.g., tax credit, rebate, loan, direct service)		
Eligible technology or technologies (e.g., heat pump, stove), if applicable		
Amount of rebate/reward/incentive		
Eligible income		
Eligible location		
Other eligibility requirements (e.g., renter, age of existing technology)		
Who completes application (e.g., homeowner vs. contractor)		
Who submits application (e.g., homeowner		

⁴ *Procedural Order Creating Topic Tag System for Clean Heat Standard Cases*, Case No. 23-2220-RULE, Order of 12/07/23.

vs. contractor)		
Program end date, if applicable		
Program funding type (<i>e.g.</i> , federal, state, ratepayer, third party grant)		
Related website		
Approximate annual number of participants		
Other notes		


SO ORDERED.

Dated at Montpelier, Vermont, this 20th day of February, 2024.

 _____)	
Edward McNamara)	PUBLIC UTILITY
)	
 _____)	COMMISSION
Margaret Cheney)	
)	
 _____)	OF VERMONT
J. Riley Allen)	

OFFICE OF THE CLERK

Filed: February 20, 2024

Attest: 

Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)



www.efficiencyvermont.com
888-921-5990 | 802-860-4095

This document has been filed electronically using ePUC

March 15, 2024

Holly Anderson, PUC Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 23-2220-RULE, Efficiency Vermont inventory of existing heating and weatherization programs

Dear Ms. Anderson,

The attached spreadsheet provides Efficiency Vermont's response to the Vermont Public Utility Commission's *Order Requesting Information on Existing Heating and Weatherization Programs*, issued on February 15, 2024 in Case 23-2220-RULE.

Please note the information provided in the attached spreadsheet represents only a snapshot in time of Efficiency Vermont's thermal efficiency and weatherization programs. This information is subject to change as program information changes. The information outlined in the attached spreadsheet represent Efficiency Vermont's thermal efficiency and weatherization programs as of March 13, 2024.

Sincerely,

A handwritten signature in blue ink that reads "Emily Roscoe".

Emily Roscoe

Project Manager, Clean Heat Standard



163 Acorn Lane
Colchester, Vermont 05446

Chris Vaughn
Energy Innovation and Resiliency Coordinator

(802) 353-0914
chris.vaughn@greenmountainpower.com

March 15, 2024

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, Vermont 05620-2701

Re: Case No. 23-2220-RULE – Proceeding to design the potential Clean Heat Standard

Dear Ms. Anderson:

Green Mountain Power (GMP) hereby submits responses to the Public Utility Commission's February 20, 2024, *Order Requesting Information about Existing Heating and Weatherization Programs* in the spreadsheet template provided by the Commission. Our responses summarize information about the following eight programs currently offered by GMP to customers:

1. Statewide Ductless Heat Pump Midstream Rebate Program
2. Statewide Ducted Heat Pump Midstream Rebate Program
3. Low-Income Adder for Ducted and Ductless Air Source Heat Pumps
4. Act 151/44 Low-Income Fuel Switch Program
5. Air-to-Water Heat Pump Rebate
6. Ground Source Heat Pump Rebate
7. Heat Pump Water Heater Rebate
8. Induction Cooktop Rebate

Thank you for the opportunity to provide this information. Please do not hesitate to reach out with questions.

Sincerely,

Chris Vaughn

cc: Service list (*via ePUC*)



Stowe Electric Department
PO Box 190
435 Moscow Rd
Stowe, VT 05672
802-253-7215
www.stowelectric.com

March 15, 2024

Ms. Holly Anderson, Clerk
Vermont Public Utility
Commission 112 State Street
Montpelier, VT 05620-2701

Re: Case No. 23-2220-RULE, proceeding to design the potential clean heat standard

Dear Ms. Anderson:

Pursuant to the Public Utility Commission Order entered on February 20, 2024 in this docket, the Town of Stowe Electric Department (“Stowe”) respectfully submits our response. Along with this summary cover letter, Stowe submitted the clean heat standard reporting spreadsheet provided in this docket.

The spreadsheet shows that Stowe participates in the joint Efficiency Vermont (EVT) and distribution utility rebate program for heat pumps and wood and pellet stoves. In 2023, Stowe provided a reimbursement to EVT for Stowe’s share of the midstream rebate. For all customers that are not income-eligible the reimbursement to EVT is \$250. In the instance of an income-qualifying customer, Stowe provides a \$2,000 reimbursement to EVT. Stowe’s wood stove and pellet stove program has limited participation, and in 2023 no rebates were provided to our customers under the program.

EVT has provided additional marketing and outreach to customers in Stowe’s service territory in 2022 and 2023, however, only 1 customer took advantage of the low-income heat pump program. Stowe and EVT have attempted to engage Capstone Community Action to improve outreach within Stowe’s service territory; however, due to privacy concerns Capstone

has not shared information about income-eligible customers directly to Stowe or EVT. This inability to share customer information directly with the utility is one of several limiting factors in our outreach to encourage greater adoption of heat pump technology in income-qualifying homes.

The only other income-qualifying rebates Stowe has provided to customers is through our electric vehicle rebate program.

Stowe also had a successful window insert program in 2022 and 2023. In particular, Stowe's 2023 window insert program focused on income-qualifying customers and built 320 inserts for 40 households in Lamoille County. 129 of these inserts were provided to 15 income qualifying households in SED's territory – the remainder of the inserts were provided to families outside of SED's service territory.

The program included customers in the towns of Stowe, Hyde Park, and Morrisville and utilized two grants awarded to Stowe to reduce the cost of inserts for participants. Stowe offered its customers an additional rebate to further reduce the cost of the inserts. Income-qualifying customers who participated in the program were able to receive window inserts at no upfront cost to the household. While Stowe considers this a successful program offering, due to the staff time requirements and grant funding needs we will not offer this program in 2024. Stowe will keep its window insert rebate for any customer in our service territory that has purchased and installed storm window inserts.

Please let me know if you have any questions.

Sincerely,

_____/s/_____
Michael N. Lazorchak

Manager Regulatory
Affairs Stowe Electric
Department PO Box 190
Stowe, VT 05672
Phone: 802.253.7215
mlazorchak@stoweelectric.com

This spreadsheet provides an alternate way to submit comments for Order Requesting Information on Existing Heating and Weatherization Programs, Case 23-2220-RULE, Order of 2/15/24.

To facilitate those efforts to identify additional programs, incentives, and funding, the Commission requests information regarding existing programs, incentives, and funding that currently support customers with low income and moderate income to afford heating expenses, transition to beneficial electrification for heating, reduce fossil fuel consumption for heating, and install weatherization measures.

Please submit your comments by Friday, March 15, 2024, and label comments with topic tag “10 – Multiple Topics.”[1]

Use the table on the next tab to submit your information.

Additional columns may be added for additional programs.

If you are aware that a program you administer overlaps with other programs, the Commission would appreciate that information being included in the “other notes” field.

[1] Procedural Order Creating Topic Tag System for Clean Heat Standard Cases, Case No. 23-2220-RULE, Order of 12/07/23.

Item	Program 1	Program 2	Program 3
Program name	Vermont Fuel Assistance Program	Program	Program
Organization administering program	Families	Fund	Association
Program type (e.g., tax credit, rebate, loan, direct service)	Direct service	Direct Service	Rebate
Eligible technology or technologies (e.g., heat pump, stove), if applicable	Oilheat, propane, kerosene, wood, wood pellets, coal and natural gas		
Amount of rebate/reward/incentive	Varies by year	fuel	\$400.00
Eligible income	less than 185% of the federal poverty level based on household size.	N/A	N/A
Eligible location	Vermont	Vermont	Vermont
Other eligibility requirements (e.g., renter, age of existing technology)	N/A	N/A	N/A
Who completes application (e.g., homeowner vs. contractor)	Consumer	Neighbor/Friend	Consumer
Who submits application (e.g., homeowner vs. contractor)	Consumer	Neighbor/Friend	Contractor
Program end date, if applicable	Ongoing	Ongoing	Program on pause
Program funding type (e.g., federal, state, ratepayer, third party grant)	Federal	Donations (501c3)	NORA Grant Funding
Related website	https://dcf.vermont.gov/benefits/fuel	ticketsplit.org	bate/
Approximate annual number of participants	15k	50 per year	231
Other notes			



FILED VIA ePUC

March 15, 2024

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 23-2220-RULE
Proceeding to design the potential Clean Heat Standard

Dear Ms. Anderson:

Vermont Gas Systems, Inc. ("VGS") is pleased to provide the attached spreadsheet, **VGS Attachment A**, in response to the Commission's February 20, 2024 Order Requesting Information About Existing Heating and Weatherization Programs.

We note that most of the existing programs identified in **VGS Attachment A** are offered through VGS's Energy Efficiency Utility. More information on those programs is available in VGS's 2024-2026 Triennial Plan, which details VGS's increased focus on serving low- and moderate-income customers.¹ Also identified is VGS's Low-Income Assistance Program, which we have offered since July 2013 and update annually.² Finally, the Switch and Save program is in development, expected to commence in the coming months.

Throughout the company, VGS is committed to prioritizing efforts to offer an equitable transition to low- and moderate-income customers with high energy burdens. We appreciate the efforts of the Equity Advisory Group members and look forward to their recommendations.

Respectfully submitted,

/s/ Mary G. Bouchard

Mary G. Bouchard
Corporate & Regulatory Counsel
Vermont Gas Systems, Inc.
mbouchard@vermontgas.com

¹ See VGS Triennial Plan, filed February 7, 2024 in Case No. 23-4102-INV.

² See Docket No. 7888 and Case No. 23A-3219.

This document has been filed electronically using ePUC

March 8, 2024

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Post Office Drawer 20
Montpelier, Vermont 05620-2701

Re: **Case No. 23-2220-RULE** – Vermont Housing Finance Agency comments on order requesting information about existing heating and weatherization programs

Dear Clerk Anderson,

On February 20, 2024, the Vermont Public Utility Commission (“Commission”) issued an Order requesting information about existing heating and weatherization programs to inform the design of the Clean Heat Standard.

VHFA has completed the Commission-issued spreadsheet on programs it operates. However, VHFA also wishes to submit written comments to clarify these programs and highlight issues related to funding efficiency in affordable housing projects that the Commission may not be currently aware of.

VHFA awards federal and state housing tax credits, loans, and other subsidies to housing developers to support the construction and rehabilitation of affordable rental and owned homes, including the replacement of manufactured homes. These projects are often jointly subsidized by VHFA, Vermont Housing & Conservation Board, and the State of Vermont Department of Housing & Community Development, among other housing funders.

Most projects are built to high performance building design standards and receive energy rebates and other efficiency subsidies through the state’s Energy Efficiency Utilities (EEUs) and Distribution Utilities (DUs). Therefore, the Commission will likely see the same programs for affordable housing appear on the spreadsheets submitted in response to this Order from multiple parties involved in funding housing projects.

However, state EEU/DU subsidies cover just a small fraction of the costs of the energy efficiency measures (including thermal energy efficiency improvements, heating equipment) for these projects. Costs vary widely depending on the project type, but in a newly built multifamily affordable housing development built to high performance standards, the subsidies available through Efficiency Vermont typically currently cover about \$2,600 per unit, whereas a 2019 study of affordable housing costs showed “projects that receive funding for energy efficiency or green building interventions do have higher per-unit costs than other projects by about \$41,000. The funding provided through energy funding of Efficiency Vermont totaled only \$2,500 per unit, suggesting that these funding sources were not covering the total cost of the energy efficiency investments.”¹ .

¹ [Analysis of Vermont Affordable Rental Housing Development Cost Factors](#)

To date, housing funders have not systematically separated the building costs directly related to greenhouse gas reducing measures in project budgets. However, it is abundantly clear that the currently available subsidies do not fully subsidize all costs for efficiency investments in the buildings VHFA funds. Instead, the majority of these costs are borne by housing developers and housing subsidy dollars.

Given the wide gulf between the total costs of measures and the available energy subsidies, VHFA believes that the attribution of emissions reductions benefits in affordable housing is not well accounted for under existing models and the data collection currently underway will not shine a light on this reality.

It is very likely that under a Clean Heat Standard, affordable housing developers will seek to fully account for greenhouse gas reductions currently funded by housing dollars and claim credit for efficiency measures that are not fully subsidized by energy funding sources under the current system. Depending on how Clean Heat Credits are generated and owned under the Clean Heat Standard, this may involve a complicated allocation process, as housing developers, multiple housing funders, and utilities will all have a role in funding a single housing project.

VHFA strongly urges the Commission to conduct a stand-alone affordable housing study to consider the issues of credit ownership in complex projects under a Clean Heat Standard design. The effort should set clear expectations and enable equitable sharing of funding streams produced by credits.

This work will have important equity implications, as affordable housing serves some of the lowest income and most vulnerable households in the state. Obligated parties will likely look towards affordable housing as a method of reaching the required low- and moderate-income households required under the standard. Designing a system that facilitates beneficial electrification and thermal improvements in affordable housing will help reduce costs and increase benefits for low-income residents, in addition to reducing emissions.

VHFA appreciates the opportunity to provide comments on this order and will be happy to work with its partners to provide additional data on affordable housing projects throughout this proceeding.

Sincerely,



Mia Watson

Special Programs Manager
Vermont Housing Finance Agency



Washington Electric Cooperative, Inc.

P.O. Box 8, 75 Vermont Route 14N
East Montpelier, Vermont 05651

Telephone: 802-223-5245; Fax: 802-223-6780
www.washingtonelectric.coop

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

15 March 2024
RE: 24-0220 ; Tier 3 compliance filing for 2023

Dear Ms. Anderson:

Washington Electric Co-op hereby responds to the PUC Order dated 2/20/2024 requesting a listing of income eligible programs and services provided to WEC's eligible membership.
Please let me know if there are questions.

Thank you.

A handwritten signature in black ink that reads "Bill Powell". The signature is written in a cursive, slightly slanted style.

William Powell
Director, Products & Services

Filed by ePUC.

Item	Program 1	Program 2
Program name	Vermont Low Income Weatherization Assistance Program at CVOEO	
Organization administering program	Champlain Valley Weatherization Services/ CVOEO	
Program type (e.g., tax credit, rebate, loan, direct service)	Direct Service	
Eligible technology or technologies (e.g., heat pump, stove), if applicable	comprehensive "whole house" energy assessment, state-of-the-art building diagnostics, and full-service energy-efficient retrofits.	
Amount of rebate/reward/incentive	\$15,300 is the average Job Cost Average	
Eligible income	80% Area Median Income or 200% of Federal Poverty Level	
Eligible location	Chittenden, Franklin, Addison, and Grand Isle counties	
Other eligibility requirements (e.g., renter, age of existing technology)	Waiting list is weighted for certain criteria	
Who completes application (e.g., homeowner vs. contractor)	homeowner	
Who submits application (e.g., homeowner vs. contractor)	homeowner	
Program end date, if applicable	n/a	
Program funding type (e.g., federal, state, ratepayer, third party grant)	Federal and state	
Related website	https://www.cvoeo.org/get-help/weatherization	
Approximate annual number of participants	250+/200 on waiting list	