

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 18-3810-INV

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Investigation into Renewable Energy Standard  
rulemaking

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Order entered: 05/02/2019

**ORDER REQUESTING COMMENT ON PROPOSED DRAFT RULE**

**I. INTRODUCTION**

In today's Order, the Vermont Public Utility Commission ("Commission") requests comments on the Commission's draft proposed Renewable Energy Standard ("RES") Rule.

**II. BACKGROUND**

In November 2018, Commission staff opened an investigation to begin the process of drafting the RES Rule. Presently, the RES is authorized under statute and implemented by order.<sup>1</sup> However, in 2018, the Vermont General Assembly directed the Commission to adopt a rule to implement the RES and required that the Commission commence the formal rulemaking process (i.e., submittal to the Interagency Committee on Administrative Rules) by July 1, 2019.<sup>2</sup>

Commission staff convened two workshops about the rulemaking and requested that stakeholders provide comments about the RES processes and provisions, currently implemented by order, that may need changes or improvements.<sup>3</sup> Workshop participants and commenters included: the Vermont Department of Public Service ("Department"), Green Mountain Power Corporation, Burlington Electric Department, Vermont Electric Cooperative, Washington Electric Co-op, Vermont Public Power Supply Authority, Renewable Energy Vermont, Sierra Club, Vermonters for a Clean Environment, Rights & Democracy, Vermont Interfaith Power and Light, the Vermont Fuel Dealers Association, the National Biodiesel Board, and William F. Scully.

As background, the RES requires Vermont electric utilities to acquire specified amounts of renewable energy in the form of renewable energy credits ("RECs") or environmental

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<sup>1</sup> 30 V.S.A. chapter 89, in particular §§ 8002, 8004, 8005, and 8006; *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Orders of 3/15/16, 6/28/16, and 10/27/16.

<sup>2</sup> Public Act 139, § 14 (2018 Vt., Adj. Sess.) (amending Public Act 56, § 8 (2015 Vt., Bien. Sess.)).

<sup>3</sup> Commission staff held workshops on December 10, 2018, and January 29, 2019.

attributes and to achieve fossil-fuel and greenhouse gas reductions by implementing energy transformation projects. An energy transformation project is:

an undertaking that provides energy-related goods or services but does not include or consist of the generation of electricity and that results in a net reduction in fossil fuel consumption by the customers of a retail electricity provider and in the emission of greenhouse gases attributable to that consumption. Examples of energy transformation projects may include home weatherization or other thermal energy efficiency measures; air source or geothermal heat pumps; high efficiency heating systems; increased use of biofuels; biomass heating systems; support for transportation demand management strategies; support for electric vehicles or related infrastructure; and infrastructure for the storage of renewable energy on the electric grid.<sup>4</sup>

The RES is divided into three categories, referred to as “Tiers.” Tier I requires the electric utilities to procure an amount of renewable energy equivalent to 55% of their annual retail electric sales for the year 2017, increasing by 4% every third January 1 thereafter, eventually reaching 75% in 2032.<sup>5</sup> Tier II requires that a portion of the renewable energy that the utilities procure to satisfy Tier I be from distributed renewable generation resources. Under Tier II the utilities must procure an amount of renewable energy equivalent to 1% of their annual retail electric sales from distributed renewable generation resources in 2017, increasing by three-fifths of a percent each year thereafter, eventually reaching 10% in 2032.<sup>6</sup> Tier III requires retail electricity providers to procure additional distributed renewable generation eligible for Tier II or to achieve fossil-fuel reductions from energy transformation projects equivalent to 2% of their annual retail electric sales in 2017, increasing by two-thirds of a percent each year thereafter, eventually reaching 12% in 2032.<sup>7</sup>

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<sup>4</sup> 30 V.S.A. § 8002(28).

<sup>5</sup> 30 V.S.A. § 8005(a)(1)(B).

<sup>6</sup> 30 V.S.A. § 8005(a)(2)(C).

<sup>7</sup> In the case of a retail electricity provider that is a municipal electric utility serving not more than 6,000 customers, the required amount for Tier III is 2% of the provider’s annual retail sales beginning on January 1, 2019, increasing by an additional two-thirds of a percent each subsequent January 1 until reaching 10 and two-thirds percent on and after January 1, 2032. 30 V.S.A. § 8005(a)(3)(B).

To draft the proposed rule, the Commission started with the ordering paragraphs from the primary order implementing the RES<sup>8</sup> (the “June 2016 Order”) and added the necessary language from the other implementing orders.<sup>9</sup> Then, the Commission made additions and changes to ensure consistency with the implementing statutes and to provide clarity and internal consistency. Next, the Commission added purpose, background, authority, and definition sections and changed terms throughout the rule to align with the terms used in the statute and other defined terms added to the rule. Finally, the Commission made changes consistent with those stakeholder comments that the Commission decided to adopt as well as changes based on Commission staff’s experience using the rule. Stakeholder comments and proposals are addressed below in the order in which they apply to the draft rule.

### **III. DISCUSSION**

#### **Section 4.404, System for Tracking Compliance with Tiers I and II**

The Commission received comments that additional efforts should be made to ensure appropriate tracking of environmental attributes associated with energy imports from external control areas (i.e., Hydro-Québec, “HQ,” and the New York Power Authority, “NYPA”), which the utilities may use to comply with Tier I of the RES.

The Commission proposes requiring that the NYPA attributes be tracked in NEPOOL GIS. When the June 2016 Order was issued, the NYPA attributes could not be tracked in GIS; however, that is no longer the case. Requiring tracking in GIS will protect against duplicative claims being made on those attributes and will help to streamline compliance review processes.

As for the HQ attributes, it is the Commission’s understanding that the HQ attributes cannot be monitored in GIS. Therefore, the Commission proposes removing the requirement in the June 2016 Order that the utility demonstrate its ownership of those attributes through retirement of the attributes as they are monitored in GIS, even if the utility claims a different value for the environmental attributes than that displayed in GIS. Additionally, it is the Commission’s understanding that if the utilities provide attestations from HQ indicating: (1) the percent of generation from renewable resources, (2) that the utility had ownership rights to the

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<sup>8</sup> *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Order of 6/28/16.

<sup>9</sup> *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Orders of 3/15/16 and 10/27/16.

attributes, and (3) that the attributes had not been claimed elsewhere, that should be sufficient for demonstrating compliance with the RES and there should not be a risk of duplicative claims being made on the attributes because there are no other jurisdictions in which those attributes may be bought or sold.

Additionally, regarding attributes from HQ, the Commission seeks comments on whether, for purposes of RES compliance, HQ attributes must be purchased in a bundle with power or whether a utility may purchase the attributes separate from a power purchase.

#### Section 4.406, Qualification of Generation Facilities for Tiers I and II

The Department made comments regarding ways to improve the registration process for qualifying facilities for Tiers I and II of the RES. The Commission is proposing to incorporate the suggested procedural changes into the draft rule. Additionally, the Commission is proposing improvements to clarify and streamline the process for approving utilities' aggregated facilities for Tiers I and II of the RES and quarterly updates to those aggregations.

#### Section 4.409, Process for Prior Approval of Energy Transformation Measures

Stakeholders provided comments on improving the transparency of the Technical Advisory Group ("TAG") process for prior approval of energy transformation measures. The Commission proposes including a provision in the rule requiring TAG meetings related to energy transformation measures to be noticed and open to the public and for time to be included in meeting agendas for public input. The Commission believes that imposing any more prescriptive requirements on the TAG through this rule is not necessary, but strongly encourages the TAG and the Department to work together to post information online about the TAG process and TAG meetings, and to maintain an "interested persons" email list for purposes of providing notice of TAG meetings.

#### Section 4.410, Cost-Effectiveness Screening of Energy Transformation Projects

Several comments were made related to the cost-effectiveness screening portion of the RES requirements, including comments about the requirement that utilities evaluate alternative energy transformation projects that do not increase electric consumption and comments about

defining “administrative costs.” The Department has stated that it will work with stakeholders over the summer to discuss these issues and will provide a proposed definition of “administrative costs” by September 30, 2019.

Because stakeholders are actively working together on these issues, the Commission is not proposing any substantive changes to this section of the draft rule at this time. The Commission anticipates receiving comments and proposals regarding these issues during the formal public comment period after the rule is approved by the Interagency Committee on Administrative Rules. The Commission will ensure that the public comment period is held open until at least September 30, 2019.

#### Section 4.412, Evaluation, Measurement, and Verification of Energy Transformation Projects

The Department recommended that as part of the utilities’ Tier III annual plans (required under Section 4.417) and annual reports, the utilities use a standard table to summarize their energy transformation projects. The utilities all filed comments in support of using standardized planning and reporting templates. The Commission has included language in the rule requiring utilities to use a standard table for summarizing energy transformation projects in Tier III annual plans and reports. As proposed, the table itself will not be a part of the rule; however, the Commission requests that stakeholders provide comments on the summary table filed by the Department in its April 5, 2019, comments.

This section of the rule also includes the process for utilities to submit and stakeholders to comment on Tier III annual reports. The Commission is proposing a new provision whereby if the Department or any interested party recommends that the Commission reject any of a utility’s energy transformation project fossil-fuel savings claims, the utility may petition the Commission by July 1 to request a ruling on whether the savings comply with the RES statute and the rule.

#### Section 4.413, Equitable Opportunity to Participate in and Benefit from Energy Transformation Projects

Stakeholders requested that the Commission incorporate guidance or process within the rule to ensure equity of participation in and benefit from Tier III energy transformation projects

for all Vermonters. The Commission previously considered the equity issue during the Docket 8550 proceeding and included provisions regarding equity in the June 2016 Order, which are now incorporated into the draft rule. If a utility is offering energy transformation projects, it must: (1) offer the projects to both low-income and non-low-income customers as well as to both residential and commercial/industrial customers, (2) provide adequate information to customers about energy transformation project offerings, and (3) track customer participation, so that the utility can iteratively refine programs, as needed to ensure equity. If stakeholders have more specific ideas for addressing equity, the Commission would welcome those comments.

#### Section 4.416, Specific Types of Energy Transformation Projects

During the review of utilities' 2017 Tier III annual reports, questions were raised about whether certain weatherization projects qualify under the RES. The Commission has proposed language to help identify low-income weatherization projects that qualify for the RES. The Commission requests that stakeholders provide comment on the average cost to create one MWh of energy savings with low-income weatherization.

#### Section 4.417, Tier III Annual Planning

##### A. Approval of Tier III Annual Plans

The Department recommended that the Commission approve the utilities' Tier III annual plans, which must be submitted each year by November 1. The utilities expressed concerns about the Department's proposal. During the 8550 proceeding, the Commission previously concluded that, "Tier III annual plans submitted by [utilities] should be subject to [Commission] review and stakeholder comment but need not be explicitly approved by the [Commission]." <sup>10</sup> Rather than requiring approval of the utilities' Tier III annual plans, the Commission proposes adding the following provisions: requiring stakeholders to submit comments on Tier III annual plans by December 1; stating that the Commission may schedule workshops on Tier III annual plans; directing the Commission to notify a utility if it finds that a Tier III annual plan does not include the information required by the rule; and stating that the Commission may issue an order

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<sup>10</sup> June 2016 Order at 55-56.

either directing the utility to file an amended plan or opening an investigation, if the Commission finds that the plan does not include the information required by the rule.

#### B. Custom Energy Transformation Projects

Stakeholders requested that Tier III annual plans include more specific information about custom energy transformation projects to allow for more meaningful stakeholder involvement. The June 2016 Order and proposed draft of the rule require the annual plans to include “a description of the types of energy transformation projects that will be undertaken, including the types of measures to be implemented and the anticipated number of participants, with sufficient information for the Department to develop an evaluation, measurement, and verification plan and budget.”<sup>11</sup> The Commission is not proposing any changes from the June 2016 Order at this time in regard to this issue, but welcomes detailed suggestions from stakeholders concerning what specific information they recommend the rule require when a utility proposes a custom energy transformation project.

Additionally, the Commission received a comment suggesting that the Commission require utilities to use an open, competitive solicitation process to select the custom energy transformation projects they will implement. While utilities may certainly use such a process (which at least one utility has already done), the Commission does not think it is necessary to mandate such a requirement through the rule.

#### C. Load Growth

In relation to the annual plan section of the rule, the Department has stated that it plans to work with stakeholders this summer to determine what specifically should be included in Tier III annual plans regarding load growth to ensure load growth does not result in unnecessary transmission and distribution upgrades. Because stakeholders are actively working together on this issue, the Commission is not proposing any substantive changes regarding this issue at this time. The Commission anticipates receiving comments and proposals about this issue during the formal public comment period after the initial proposed rule is approved by the Interagency Committee on Administrative Rules.

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<sup>11</sup> June 2016 Order, Section VII (13)(b)(i) at 78.

#### D. Nuclear Power, Non-renewables, and Energy Transformation Projects

The Commission received comments raising concerns about allowing utilities to count the nuclear portion of their power portfolios when determining the fossil-fuel savings from their energy transformation projects. Tiers I and II of the RES establish renewable energy requirements, whereas Tier III establishes energy transformation project requirements to reduce fossil-fuel use and greenhouse gas emissions. While the statute explicitly states that nuclear energy is not renewable energy, the Tier III requirements do not require that fossil-fuel savings from energy transformation project electrification measures be from renewable energy. An energy transformation project powered by electricity generated in part by nuclear power will reduce fossil-fuel use and the emission of greenhouse gases. Therefore, the Commission is not proposing to include anything in the draft rule on this issue.

Several commenters also requested that the rule prohibit energy transformation projects that use fossil fuels or non-renewable fuels. Because other stakeholders have not yet had the opportunity to provide comments on this issue, the Commission is not proposing anything in the draft rule on this topic at this time; however, the Commission welcomes stakeholders to provide comment on this issue, including the statutory basis.

Additionally, regarding nuclear, the Commission seeks comments on whether a utility may use nuclear attributes purchased separately from nuclear power to increase the carbon-free portion of its power portfolio; whether the RES statute prohibits that; and if the RES statute does not prohibit it, whether the rule should.

#### Section 4.419, Filing Schedule and Requirements

The Department recommended that the utilities use a standard compliance spreadsheet when submitting their annual compliance filings each August 31 demonstrating compliance with all three Tiers of the RES. The utilities have commented that they support using a standard compliance spreadsheet. The Commission has included language requiring utilities to use a standard compliance spreadsheet when submitting their annual compliance filings. As proposed, the spreadsheet itself will not be a part of the rule; however, the Commission requests that stakeholders provide comments on the spreadsheet filed by the Department with its April 5,

2019, comments. The Commission's goal is to adopt the compliance spreadsheet prior to August 31, 2019, so that the utilities can use it when submitting their 2018 compliance filings.

#### **IV. REQUEST FOR COMMENTS**

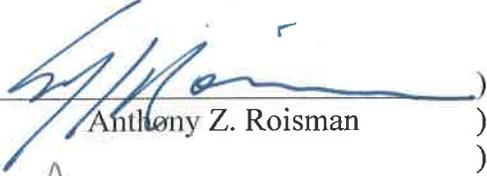
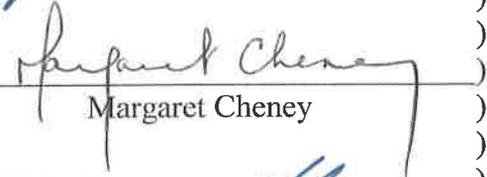
The Commission requests that stakeholders provide comments by May 24, 2019, addressing the attached draft proposed Renewable Energy Standard Rule and the issues discussed in today's Order. Additionally, stakeholders are invited to bring to the Commission's attention any other issues with the rule that should be addressed through the rulemaking process.

This rulemaking is being processed in the Commission's online document management system, known as ePUC, which can be accessed at <https://epuc.vermont.gov>. Documents related to this rulemaking are available in Case No. 18-3810-INV.

Comments should be filed in ePUC using the "Add Briefs, Comments, or Discovery" action. Comments should not be filed using the "Public Comment" option. This proceeding is not a contested case. Anyone interested in participating should contact the Clerk of the Commission at [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov) to be added to the service list for this proceeding.

**SO ORDERED.**

Dated at Montpelier, Vermont, this 2nd day of May, 2019.

	)	
Anthony Z. Roisman	)	PUBLIC UTILITY
	)	
	)	
Margaret Cheney	)	COMMISSION
	)	
	)	
Sarah Hofmann	)	OF VERMONT

OFFICE OF THE CLERK

Filed: May 2, 2019

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](mailto:puc.clerk@vermont.gov))*

PUC Case No. 18-3810-INV - SERVICE LIST

Ray Albrecht, P.E.  
National Biodiesel Board  
rayalbrechtpe@gmail.com

(for National Biodiesel  
Board)

Carolyn M.X. Alderman, Esq.  
VEPP Inc.  
P.O. Box 1938  
Manchester Center, VT 05255  
carolyn@veppi.org

(for VEPP Inc.)

Olivia Andersen  
Renewable Energy Vermont  
P.O. Box 1036  
Montpelier, VT 05601  
Olivia@revermont.org

(for Renewable Energy  
Vermont)

Carolyn Browne Anderson, Esq.  
Green Mountain Power Corporation  
2152 Post Road  
Rutland, VT 05702  
carolyn.anderson@greenmountainpower.com

(for Green Mountain  
Power Corporation)

Melissa Bailey  
Vermont Public Power Supply Authority  
P.O. Box 126  
5195 Waterbury-Stowe Road  
Waterbury Center, VT 05677  
mbailey@vppsa.com

(for Vermont Public  
Power Supply Authority)

Reginald Beliveau, Jr.  
Swanton Village, Inc. Electric Department  
P.O. Box 279  
120 First Street  
Swanton, VT 05488  
rbeliveau@swanton.net

(for Swanton Village,  
Inc. Electric Department)

Meredith Birkett  
Village of Johnson Water & Light Department  
P.O. Box 603  
Johnson, VT 05656  
vojmanager@townofjohnson.com

(for Village of Johnson  
Water & Light  
Department)

Victoria J. Brown, Esq.  
Vermont Electric Cooperative, Inc.  
42 Wescom Road  
Johnson, VT 05656  
vbrown@vermontelectric.coop

(for Vermont Electric  
Cooperative Inc.)

Christopher Burns  
City of Burlington Electric Department  
cburns@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Ellen Burt  
Town of Stowe Electric Department  
P.O.Box 190  
Stowe, VT 05672  
eburt@stoweelectric.com

(for Town of Stowe  
Electric Department)

David G Carpenter  
Facey Goss & McPhee PC  
PO Box 578  
Rutland, VT 05702  
dcarpenter@fgmvt.com

William Coster  
1 National Life Drive  
Davis 2  
Montpelier, VT 05620  
billy.coster@vermont.gov

(for Vermont Agency of  
Natural Resources)

Matt Cota  
Vermont Fuel Dealers Association  
963 Paine Turnpike North  
Berlin, VT 05602  
matt@vermontfuel.com

(for Vermont Fuel  
Dealers Association)

Stephen Crowley  
Sierra Club  
12 Pleasant Ave.  
South Burlington, VT 05403  
steve.crowley1@gmail.com

William F. Ellis  
McNeil, Leddy & Sheahan  
271 South Union Street  
Burlington, VT 05401  
wellis@mcneilvt.com

(for City of Burlington  
Electric Department)

Jonathan Elwell  
Village of Enosburg Falls Water & Light  
42 Village Drive  
Enosburg Falls, VT 05450  
jelwell@enosburg.net

(for Village of Enosburg  
Falls Water & Light  
Department Inc.)

Elijah D Emerson, Esq.  
Primmer Piper Eggleston & Cramer PC  
PO Box 1309  
Montpelier, VT 05601  
eemerson@primmer.com

(for Village of Enosburg  
Falls Water & Light  
Department Inc.) (for  
Town of Hardwick  
Electric Department)  
(for Town of Northfield  
Electric Department)  
(for Village of Johnson  
Water & Light  
Department)  
(for Vermont Public  
Power Supply Authority)

Steven R Farman  
Vermont Public Power Supply Authority  
5195 Waterbury-Stowe rd  
Waterbury Center, VT 05766  
sfarman@vppsa.com

Phillip Foy  
Encore Renewable Energy  
110 Main Street, Suite 2E  
Burlington, VT 05401  
phillip@encorerenewableenergy.com

(for Encore Renewable  
Energy)

Deena Frankel  
Vermont Electric Power Company  
366 Pinnacle Ridge Road  
Rutland, VT 05701  
dfrankel@velco.com

(for Vermont Electric  
Power Company, Inc.)

James Gibbons  
City of Burlington Electric Department  
585 Pine Street  
Burlington, VT 05401  
jgibbons@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Jeremy D. Hoff  
Stackpole & French  
Stackpole & French  
P.O. Box 819  
Stowe, VT 05672  
jhoff@stackpolefrench.com

(for Town of Stowe  
Electric Department)

Bill Humphrey  
Village of Lyndonville Electric Department  
P.O. Box 167  
20 Park Avenue  
Lyndonville, VT 05851  
bhumphrey@lyndonvilleelectric.com

(for Village of  
Lyndonville Electric  
Department)

Sandra Levine, Esq.  
Conservation Law Foundation  
15 East State Street, Suite 4  
Montpelier, VT 05602  
slevine@clf.org

(for Conservation Law  
Foundation)

Andrew Lidington  
Sustainable Energy Advantage, LLC  
161 Worcester Road  
Suite 503  
Framingham, MA 01701  
alidington@seavantage.com

(for Sustainable Energy  
Advantage, LLC)

Tom Lyle  
Burlington Electric Department  
585 Pine St  
Burlington, VT 05401  
tlyle@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Pamela Moore  
Village of Jacksonville Electric Company  
P.O. Box 169  
Jacksonville, VT 05342  
pmoore@jacksonvilleelectric.net

(for Village of  
Jacksonville Electric  
Company)

John Morley  
Village of Orleans Electric Department  
Municipal Building  
One Memorial Square  
Orleans, VT 05860  
orloffice@villageoforleansvt.org

(for Village of Orleans  
Electric Department)

Craig Myotte  
Village of Morrisville Water & Light Department  
857 Elmore Street  
Morrisville, VT 05661  
cmyotte@mwlvt.com

(for Village of  
Morrisville Water &  
Light Department)

Ken Nolan  
Vermont Public Power Supply Authority  
P.O. Box 126  
Waterbury Center, VT 05677  
knolan@vppsa.com

(for Vermont Public  
Power Supply Authority)

James V. Pallotta  
Village of Ludlow Electric Light Department  
9 Pond Street  
Ludlow, VT 05149  
jpleld@tds.net

(for Village of Ludlow  
Electric Light  
Department)

Jessica Patterson  
Town of Hardwick Electric Department  
PO Box 516  
Hardwick, VT 05843  
jess@hardwickelectric.com

(for Town of Hardwick  
Electric Department)

Tim Perrin  
Vermont Energy Investment Corporation  
tperrin@veic.org

(for Efficiency Vermont  
- Vermont Energy  
Investment Corporation)

Mary Powell  
Green Mountain Power Corporation  
163 Acorn Lane  
Colchester, VT 05446  
ceo@greenmountainpower.com

(for Green Mountain  
Power Corporation)

William Powell  
Washington Electric Cooperative, Inc.  
PO Box 8  
East Montpelier, VT 05651  
bill.powell@wec.coop

(for Washington Electric  
Cooperative Inc.)

Patricia Richards  
Washington Electric Cooperative, Inc.  
P.O. Box 8  
East Montpelier, VT 05651  
patty.richards@wec.coop

(for Washington Electric  
Cooperative Inc.)

Evan Riordan  
Barton Village, Inc. Electric Department  
P.O. Box 519  
Barton, VT 05822  
electricmanager@bartonvt.com

(for Barton Village Inc.  
Electric Department)

Carol Robertson  
Village of Hyde Park Electric Department  
P.O. Box 400  
Hyde Park, VT 05655  
carol.robertson@hydeparkvt.com

(for Village of Hyde  
Park Electric  
Department)

Matt Rutherford  
Town of Stowe Electric Department  
P.O. Box 190  
56 Old Farm Road  
Stowe, VT 05672  
mrutherford@stoweelectric.com

(for Town of Stowe  
Electric Department)

Jeffrey Schulz  
Town of Northfield Electric Department  
51 South Main Street  
Northfield, VT 05663  
jschulz@northfield.vt.us

(for Town of Northfield  
Electric Department)

William F Scully  
Hoosic River Hydro  
14 Pleasant Street  
PO Box 338  
North Bennington, VT 05257  
wfscully@gmail.com

Ronald A. Shems, Esq.  
Tarrant Gillies & Richardson  
P.O. Box 1440  
Montpelier, VT 05601-1440  
rshems@tgrvt.com

(for Washington Electric  
Cooperative Inc.)

William P. Short, III  
PO Box 237173  
44 West 62nd Street  
New York, NY 10023-7173  
w.shortiii@verizon.net

Darren Springer  
City of Burlington Electric Department  
585 Pine Street  
Burlington, VT 05401  
dspringer@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Melissa Stevens  
Green Mountain Power Corporation  
2152 Post Road  
Rutland, VT 05701  
melissa.stevens@greenmountainpower.com

(for Green Mountain  
Power Corporation)

Michael Sullivan  
Town of Hardwick Electric Department  
P.O. Box 516  
Hardwick, VT 05843  
msullivan@hardwickelectric.com

(for Town of Hardwick  
Electric Department)

Rebecca Towne  
Vermont Electric Cooperative, Inc.  
42 Wescom Road  
Johnson, VT 05656  
rtowne@vermontelectric.coop

(for Vermont Electric  
Cooperative Inc.)

Matthew J. Walker  
Efficiency Vermont-Vermont Energy Investment Corporation  
128 Lakeside Avenue, Suite 401  
Burlington, VT 05401  
mjwalker@veic.org

(for Efficiency Vermont  
- Vermont Energy  
Investment Corporation)

Allison Bates Wannop  
Vermont Department of Public Service  
112 State Street  
Montpelier, VT 05620-2601  
allison.wannop@vermont.gov

(for Vermont  
Department of Public  
Service)

David C. Westman  
Efficiency Vermont - Vermont Energy Investment Corporation  
128 Lakeside Avenue, Suite 401  
Burlington, VT 05401  
dwestman@veic.org

(for Efficiency Vermont  
- Vermont Energy  
Investment Corporation)

Sarah Wolfe  
Energy Action Network  
17 State Street  
Suite 205  
Montpelier, VT 05602  
swolfe@eanvt.org

(for Energy Action  
Network)