

Buildings and Thermal		
Date Received:	Comment:	Response to Comment:
11/01/2021	RE: P1/S1/A1 Adopt legislative or administrative recommendations made by the Weatherization at Scale Working Group (WWG) - “Should have flagged in the survey, now that I read the details that it is something that we haven’t seen yet...I had assumed the subcommittee had already vetted the proposal.”	Action 1 has been revised to read: Adopt legislative or administrative recommendations <i>consistent with those set out by</i> the Weatherization at Scale Working Group (WWG) with the goal of weatherizing 90,000 additional homes by 2030.
11/01/2021	RE: P1/S1/A3 Energy and financial coaching - “In our RRA subcommittee we have identified the need for navigators to guide people through the process. We support help targeted for low and moderate income households and recognize it is people of all incomes who have challenges figuring out what to do in weatherization.”	Adopted S. Phillips proposed text: Authorize implementation of a plan for coordinating and enhancing energy and financial coaching services for Vermonters with low and moderate incomes consistent with recommendations from the Energy Counseling Savings Work Group and their legislative report.
11/01/2021	RE: P1/S1/A4 On-bill financing tariffs - “How will this help rural areas where regulated utilities are not the primary source of heat?”	Under Clean Heat Standard (pathway 2, strategy 1) credits can be earned by any utility (e.g. electric utility) even if they are not the primary source of heat.
10/31/2021	Summary statement on equity - “Feel free to use this graphic to illustrate the point: https://www.eanvt.org/wp-content/uploads/2021/06/Th-heatingcostovertime.png (I can also try to get this updated, since prices have changed so significantly in 2021).”	Will review inclusion of graphics with organizers to determine if consistent with CAP drafting guidance.
10/31/2021	RE: Description of GHG emissions from thermal - “Would be good to have parallel language here and in the transpo sector – currently they are close but not quite parallel”	While text is not identical the two sections contain similar information regarding share of the state’s greenhouse gas emissions and the percentage of total energy expenditures.
10/31/2021	RE: Characterization of wood as relatively lower carbon intensive when compared to fossil heating fuels - “Need to make sure this is consistent with recommendations from Ag & Ecosystems”	B. Coster 11/5: A majority of Ag & Ecosystems subcommittee members appear to support the thermal application of modern wood heat technology and wood fuel; final determination expected at 11/12 Ag & Ecosystems meeting

10/31/2021	RE: Pathway 1 – Reduce energy use in building by at least 25% - “Was a time of transfer requirement on the sale of residential homes discussed as part of achieving this goal?”	Time of transfer, building labeling and benchmarking are alluded to in the rental efficiency standard section. However, due to the relative uncertainty as to how often properties are transferred, they are rejected in favor of a more explicit effort to address inefficient building stock being rented today
10/31/2021	RE: P1/S1/A1 Adopt legislative or administrative recommendations made by the Weatherization at Scale Working Group (WWG) - “Appreciating that the individual projects themselves are generally straightforward, has it been proven out that weatherization at scale is technically feasible?”	Weatherization target of 90,000 additional homes by 2030 will be discussed at 11/10 Science & Data meeting
10/31/2021	RE: Implementation of WWG recommendations - “Would like to understand better what would be required of the Administration, as opposed to other partner/implementers.”	The responsibilities of the administration and other implementers traditionally involved in reviewing efficiency proposals regarding specific WWG recommendations will be clearer once the final report is available.
10/31/2021	RE: P1/S2 Landlords are best positioned to make EE improvements in the buildings they lease - “I am struggling with this statement and what “best positioned” means because the work isn’t happening right now...”	This is an important point that the Sec. has recognized. First, grammatically speaking, “best” has been changed to “better”. Landlords are better positioned to make these investments due to their superior ownership rights to properties, access to capital, and knowledge of the property. As we note, they simply don't have much of an incentive to make these investments because tenants rather than landlords typically do not pay energy bills.
10/31/2021	RE: P1/S3/A1 Update statewide residential building code equity - “This should speak to how we square this [EE] with the need for affordable housing and the impact that building energy codes will have on cost.”	Action 1 Equity text now includes the following: “However, complying with codes may increase construction or renovation costs. Especially for affordable housing, incentives or grants may be needed to help ensure that increased construction or renovation costs do not result in higher rental fees.”
10/31/2021	RE: P1/S3/A2 Energy code training - “What about training for architects, engineers and builders? By the time something is being	Action 2 Impact was amended to include: “Impact could be further enhanced if additional and expanded

	built, it is often too late if these practices have not been folded into the design (regardless of whether or not they are required)	training were offered as well to engineers, architects, and builders. However, the need for municipal assistance was deemed a priority for most urgent action during development of this CAP.”
10/31/2021	RE: P1/S3/A2 Energy code enforcement assistance - “Concerned that most munis don’t do building inspections and so this tool is a mismatch with current reality.”	As per above, the need for municipal assistance was deemed a priority to support increased capacity for municipal building inspections.
10/31/2021	RE: P2 Reduce building-related carbon emissions by reducing the carbon content of fuels - “Again, should be reviewed to ensure language is parallel with that in the transpo section.”	Transportation: Vermont’s reliance on liquid fossil fuels is a significant drain on our economy. Vermonters collectively spend over \$1 billion on fossil fuels for transportation. Approximately 77% of those dollars leave the state’s economy every year. In contrast, electricity purchases keep far more dollars in Vermont. Over 60% of every dollar spent on electricity stays here. Moving to more efficient, electric vehicles will keep more of the money we collectively spend on transportation in the state’s economy.”
11/02/2021	Summary statement – Weatherization Assistance Program - “This incorrectly states Community Action Agencies. In the NEK, it is not a CAA. Should say... “and the Home Weatherization Assistance Program administered the Office of Economic Opportunity and delivered by local agencies.” It could also say “4 Community Action Agencies and the Northeast Employment Training Organization.”	Text amended to “Offering weatherization, energy efficiency, and clean energy rebates, incentives, and services through Efficiency Vermont, electric and gas utility companies serving Vermont, and the Home Weatherization Assistance Program delivered by Community Action Agencies throughout the state administered by the Office of Economic Opportunity and delivered by the four Community Action Agencies and the Northeast Employment Training Organization.”
11/02/2021	RE: P1/S1/A1 goal of weatherizing 120K homes - “I think it's important to look more closely at the 120,000 - to understand if this is additive or the assumptions behind this as a feasible goal. I'm happy to be part of looking at this more closely.”	Per Cadmus-EFG, target is 90,000 additional retrofits by 2030 for a total of 120,000. Science & Data will be discussing this target on 11/10
11/02/2021	RE: Implementation of WWG recommendations - “Incorporate a blank slate of recommendations from the Weatherization at Scale Working Group that EAN administers? I am not sure this is	Action 1 has been revised to read: Adopt legislative or administrative recommendations <i>consistent with those set out by</i> the Weatherization at Scale Working Group

	appropriate as a blank statement. What are the recommendations? This working group has not been subject to the same public meeting requirements of the Climate Council. This group is doing important work, and if there are specific strategies or actions, those should be included.”	(WWG) with the goal of weatherizing 90,000 additional homes by 2030.
11/02/2021	RE: P1/S1/A3 Energy and financial coaching - “This action would be better restated as: Authorize implementation of a plan for coordinating and enhancing energy and financial coaching/counseling services for Vermonters, consistent with recommendations from the Energy Counseling Savings Work Group and their legislative report.”	Adopted S. Phillips proposed text: Authorize implementation of a plan for coordinating and enhancing energy and financial coaching services for Vermonters with low and moderate incomes consistent with recommendations from the Energy Counseling Savings Work Group and their legislative report.
11/02/2021	RE: P1/S1/A4 On-bill financing tariffs equity - “I see all of these recommendations lifting up ways that it addresses equity - but I don't see them identifying or naming areas for future equity considerations in implementation - i.e., problem areas that need solutions. That feels like a missed opportunity. For this one, I would name that disconnection is a major issue to address.”	Buildings/thermal task leads agree with S Phillip's observation that this is an opportunity to place greater emphasis on complementary energy programs designed to promote greater equity. We have noted this in (1) our introductory paragraphs, the focus of Weatherization at Scale, (2) the discussion of central purpose of the rental efficiency standard, and (3) our discussion of the need for the Clean Heat Standard to be coordinated with other low- and moderate-income programs (Pathway 2, Strat. 1, para. 2). “Disconnection policy” was added to the list of policies to consider to minimize adverse effects on low-income/equity community customers.
Electricity		
Date Received:	Comment:	Response to Comment:
11/1/2021	(Crosscutting – and specifically for the buildings sector) Would like more information on how requiring on-bill financing tariffs by electric and gas utilities will impact the providers and provide incentives/ease of adoption for residences that heat with unregulated fossil fuels (such as propane) that are more common in rural areas.	There is an on-bill pilot project right now, led by VHFA with utility and state agency participation, that is expected to yield more information on good design for any permanent on-bill program. The pilot is targeted at weatherization improvements, not heat switching, and would use electricity bills as the mechanism for payment, backed by a loan loss reserve.

		Underwriting standards and financial education/navigation are a part of the pilot to help ensure Vermonters who decide to participate can afford to do so and likely will save money overall. The debt would be “to the meter,” meaning any new tenant (for rentals) or homeowner would take over the payment upon move in. There are many details to work out, including ultimate scope of measures that could be paid on the electric bill, whether nonpayment could result in disconnect, how new tenants/owner transfer will be handled; hence, there will be text changes in Buildings section from initial draft to acknowledge endorsement of continued to work to build a good permanent program.
11/1/2021	Concern with reliance on PUC in any recommendations. Unclear on their training in DEI and environmental justice and the monitoring of PUC processes. Not confident that the way in which PUC work is directed or the way they are managing it sufficiently incorporates equity implications of their decisions.	Suggest that DEI and EJ training and process improvements (including those already underway) be lifted up into the crosscutting section, since this comment could apply not only to the PUC but to other state permitting processes related to climate change (ANR, Act 250/NRB, local permitting). Addressed in text by highlighting need for equity considerations in any PUC-regulated program or rulemaking, including RES.
11/2/2021	Would like additional information on electrification for all program, specifically how would upgrading electric services be paid for and how it would be supported in lower-income and multi-family housing.	Addressed in text by noting passed federal infrastructure bill support for residential electric system upgrades. Any state program requires design of funding structure; text notes need to create difference financing tool depending upon income level.
Public Comments throughout	Level of GHG emissions from certain renewable resources, including biomass and HQ.	Addressed in text – S&D recommendation on GHG inventory methodology for all sources.

Public Comments throughout	Concern regarding flooded forestland from large reservoir hydro; concern regarding HQ Indigenous land appropriation	Crosscutting – S&D recommendation on GHG inventory methodology addresses first; second should be addressed in crosscutting text re: tradeoffs of energy choices and impacts outside VT borders.
Public Comments throughout	Need for additionality in RES	Addressed in text – recommendation to adopt 100% RES after considering design options, including greater level of new renewable resources in state and regionally balanced with existing renewable resources in state and regionally.
Public Comments throughout	Siting concerns – solar, wind, particularly instate	To the extent it is within the scope of this report, this is addressed in the text regarding the 100% RES recommendation to further study/consider many design parameters including level of instate new renewables to balance overall carbon free portfolio.
Public Comments throughout	Concern re: chemicals in renewable energy and electrification; concern re: disposal/decommissioning	Crosscutting – applies to all resources (solar panel production; wind turbine production; renewable project decommissioning; battery production/disposal; fossil fuel extraction, use, disposal; etc.) should be addressed in crosscutting text re: tradeoffs of energy choices and impacts outside and inside VT border
Transportation		
Date Received:	Comment:	Response to Comment:
10/28/2021	Consider including electric utilities as playing a leadership role in EVSE deployments to determine locations and financially support installations.	Comment recommendation has been incorporated into the text.
10/28/2021	Include the electric infrastructure to support the charging equipment in discussions of EVSE installations.	Comment recommendation has been incorporated into the text.
10/28/2021	Modify beneficial EV charging rate language and structure to incorporate the concept of “shared savings” rather than a subsidy, which would be paid for by others and raise equity concerns.	Comment recommendation has been incorporated into the text.

10/29/2021	Concerns with suggesting or committing to TDM related alternatives such as passenger rail, biking, walking for rural Vermonters.	Passenger rail, biking, and walking may not be feasible alternatives for Vermonters in rural areas outside of towns and village centers. They are more feasible in dense, mixed-use areas including the state's cities and large towns and have several co-benefits including health and equity. These modes provide transportation alternatives to Vermonters who cannot drive or afford a vehicle. There must be mix of strategies and an acknowledgement that not all emissions reduction solutions will work for all situations or scenarios. Reducing the VMT by rural Vermonters will require different strategies, including providing rural Vermonters with options for less travel and converting that VMT to electric miles traveled (e.g. electric vehicles).
10/29/2021	Question on contingency due to very aggressive rate of necessary EV adoption. Likely unrealistic growth rate and total number of EVs to meet 2030 targets.	Agree that this is an ambitious and potentially aspirational target, but the LEAP modeling indicates that this is the number of electric vehicles that will be required to reach the GHG emissions reduction levels mandated by the GWSA. In short: It provides an important sense of scale and a sense of the pace required to inform the conversation, policy, program development etc. This entire endeavor will be iterative, but the pathways and actions put forward in this sector must achieve as much progress towards this target as possible, and any action that achieves emission reductions in the carbon-intensive transportation sector is needed progress.
10/29/2021	Suggests clarification on future T-Bill funding language in EV incentives Timeline to Implement section.	Comment recommendation has been incorporated into the text.
10/29/2021	Suggests clarification on continued T-Bill related funding for Replace Your Ride and Mileage Smart programs.	Comment recommendation has been incorporated into the text.
10/29/2021	Concerned that vehicle efficiency price adjustment could be regressive and impact EJ and rural communities in VT, but notes	The design of the program will be critical to ensure that low-income individuals, and those who require certain

	that language does attempt to address this. Also believes revenue should stay within the transportation realm (to sustain programs or go towards the Transportation budget).	vehicles without an available cost effective and viable lower emission alternative are not negatively impacted. Details of program design have not been completed but it is envisioned to be a revenue neutral program built on the premise of avoiding disproportionate impacts to more vulnerable Vermonters and small businesses. Comment recommendation has been incorporated into the text.
10/29/2021	Would appreciate more emphasis that AOT has done a lot of work in the EVSE space and has made a lot of progress through ongoing programs, but acknowledges the need for more.	Comment recommendation has been incorporated into the text.
10/29/2021	Notes that investments in workplace and multi-family EVSE are currently underway and must continue to be a priority.	Comment recommendation has been incorporated into the text.
10/29/2021	Suggests changing TCI-P from “Participate in...” to “Urge Participation in...”. Also concern that if Vermont joined TCI-P that funds would not necessarily sustain transportation needs and believes that the proposal needs to clarify where the funds would go.	<p>The Climate Council has the authority, under the GWSA, to direct the administration to participate in TCI-P and adopt the TCI-P model rule. The Cross Sector Mitigation subcommittee, by consensus, has identified the TCI-P as a critical mechanism to enable the implementation and expansion of the programs and initiatives set forth in this vehicle electrification pathway. Adopting TCI-P will provide a consistent funding source for these initiatives to help rapidly increase the pace of EV adoption including funding for some programs now supported with funds from the Transportation Bill</p> <p>The legislature will need to decide how TCI-P revenue is appropriated. Recommendations from the Climate Council for how funds will be spent are described in the Transportation Pathways herein. To inform the legislative policy making conversation, we have recommended prioritizing programs that serve low-income, overburdened communities. We have also recommended and urge a recommendation to guide the legislative conversation related to 1) considering a firewalled fund that enables TCI-P revenues go to</p>

		transportation or transportation-enabling investments; 2) considering expanding the MOU-required equity board to improve public access and process and 3) directing more than the minimum MOU-required 35% of revenues into lower-income, overburdened, rural communities to help realize greater equity outcomes.
10/29/2021	Need to provide clarity on where funds come from for enhancement/expansion of Driver’s Education curriculum recommendation, as well as costs in equity section.	Possible funding sources for this action are explained elsewhere in the Pathway (e.g. TCI-P auction revenues, pending legislative action to allocate those revenues).
10/29/2021	Suggests clarifying “available funding” for mitigating the upfront costs of heavy-duty electrification (and hydrogen fuel cell) vehicles.	Possible funding sources for this action are explained elsewhere in the Pathway (e.g. TCI-P auction revenues, pending legislative action to allocate those revenues).
10/29/2021	Notes in Advanced Clean Trucks and Low NOx Omnibus Impact piece of Market Driving, Technology-Forcing Regulatory Programs section that recommendation should be careful and realistic in describing 2030 heavy-duty electric vehicle demand because AOT has been attempting to get those vehicles and they are difficult to acquire.	Adoption of the California Air Resources Board regulations is a measure to help ensure that vehicle manufacturers are required to bring increasing numbers of heavy-duty electric vehicles to Vermont to meet their credit obligations. These regulations are designed to address availability issues in the medium and heavy-duty EV space and to enable a faster transformation of the heavy-duty vehicle fleet.
10/29/2021	Funding source question related to electrification of medium and heavy-duty vehicle auxiliary systems.	Possible funding sources for this action are explained elsewhere in the Pathway (e.g. TCI-P auction revenues, pending legislative action to allocate those revenues).
10/29/2021	Additional suggestions on TCI-P. Notes that this suggestion is repeated several times in the text, and suggests possibility of having the legislature make the decision whether or not Vermont should join TCI-P.	Including TCI-P under multiple pathways is part of the over approach to reducing transportation emissions across various strategies (in the light duty sector, in the heavy-duty sector, through lowering the carbon content of fuel etc.) Repetitive language will be deleted and original language will be referenced in subsequent sections that discuss TCI-P.

10/29/2021	Potential concern with state staff being “re-allocated” to a central climate office and the impact on current programs that this might have.	This will be addressed in the cross-cutting pathways section, and will be deleted here.
10/31/2021	Concerned with potentially unrealistic scale up and pace of EV adoption. Would like to understand if/how this was considered.	Number of light-duty EVs included in the impact section is derived from LEAP modeling outcomes, which expresses number of EVs that need to be deployed to reach GHG reduction goals. It is not necessarily a reflection of total EVs that will be deployed with proposed pathways. It is a starting point to inform the direction and as implementation occurs, further public engagement is undertaken and other data and information becomes available, these numbers will likely be adjusted.
10/31/2021	Would like the EV charging rates action to speak to the financial impacts these would have on investments in transportation infrastructure.	It’s recognized that transportation funding through gas tax revenues is threatened by increased vehicle efficiency, fuel switching, and reduced overall vehicle use. This is an important issue that will need far greater consideration and attention, but a remedy is beyond the plan’s scope at this time. Ongoing work on The Interagency Task Group on Transportation User fees led by VTrans is the proper venue for this critical issue to be addressed.
10/31/2021	Low carbon fuel standards/incentivizing use of biofuels can have negative environmental impacts. Would like to know if/how this recommendation has been coordinated with the Ag and Ecosystems subcommittee.	Note that TCI is not a LCFS, but a market-based emissions reductions program. The TCI-P program does not <i>require</i> that regulated entities switch to fuels with lower carbon intensity (e.g. biofuels). We agree that it is important to consider the questions related to the life cycle emissions and other impacts of biofuels and their production. Biofuels are contemplated in Ag and Ecosystems subcommittee’s recommended Storage and Sequestration Pathway. ALCFS for transportation fuels was considered by the CSM but did not make the list as a priority action. Time and resources are required to investigate the feasibility and structure of a VT transportation LCFS.

10/31/2021	TCI is held as having a strong equity focus, but I am challenged to see how we can say such absent a clear commitment from the Legislature on how the proceeds would be invested.	The TCI-P MOU signed by CT, MA, RI and Washington DC includes a minimum threshold intended to drive more equitable processes and outcomes, including the establishment of an Equity Advisory Body and a commitment of "no less than 35 percent of the proceeds from the auction of allowances to ensure that overburdened and underserved communities benefit equitably from clean transportation projects and programs." This investment level, along with creating high-quality jobs, is repeated in the TCI-P Model Implementation Plan (June 2021). Program participants are expected to abide by this and other provisions of the Model Implementation Plan, but the specifics on how Vermont proceeds would be managed and allocated is under the authority of the legislature. We are recommending the Climate Action Plan sends a more clear direction to the Legislature on this point, related to 1) considering a firewalled fund that enables TCI-P revenues go to transportation or transportation-enabling investments; 2) considering expanding the MOU-required equity body to improve public access and process and 3) directing more than the minimum MOU-required 35% of revenues (e.g. 50%+) into lower-income, overburdened, rural communities to help realize greater equity outcomes.
10/31/2021	Wondering for both light and heavy-duty vehicle electrification if there is a way to identify and prioritize the replacement of the most polluting vehicles belonging to the most overburdened Vermonters.	This type of consideration can be incorporated into proposed research and re-design of feebate/ incentive program(s) to scale incentive amount and applicability to gain the greatest emission reductions equitably.
10/31/2021	(for the entire transportation sector) There were no low income representatives at the table as the actions and equity implications were discussed. There were no truck drivers or logistics managers.	While we recognize the need for more thorough, inclusive public engagement to more concretely refine how the programs drive and ensure equity outcomes, the transportation recommendations were informed by

	<p>As I read through it I don't read language that indicates to me that this has been vetted through an equity lens in a way that captures what the experiences of attempting to navigate this transition will mean for those without the education or means to do so or those whose jobs or businesses will be impacted. The words are there, but I don't believe them and from my vantage point they read hollow.</p>	<p>and built, in part, upon many programs developed over a decade or more with many stakeholders at those tables. The subcommittee prioritized existing programs that have embedded equity considerations into their program design (e.g. Mileage Smart, TCI-P, Advanced Clean Cars and Trucks). Our recommendations were also informed by almost a year of stakeholder engagement of parties representing low income and other interests to shape the CAP development process. We have also urged prioritizing low-income, overburdened communities in ensuing program/policy development to guide the required ensuing public processes (in the legislative arena, rulemaking, etc.) if advanced.</p> <p>RE: Engaging truck drivers/logistics managers. While there is work to do here, those important stakeholders have been engaged in various elements of this work over time (such as TCI and Advanced Clean Trucks) and in the PSD-partnered stakeholder process. We view this work as iterative. Ongoing stakeholder outreach and public engagement will be essential and must be required – to ensure a depth of understanding on how this transition impacts, and VT might mitigate those impacts to, key stakeholders (e.g. trucking) as well as low-income, rural, historically marginalized Vermonters.</p>
<p>11/2/2021</p>	<p>Electricity sector comment – but crosscutting: How would upgrading electric service be paid for, and especially how would it be supported in lower-income and multi-family housing?</p>	<p>Defer to Electricity task group for response to this comment.</p>
<p>11/4/2021</p>	<p>Suggests breaking out the piece of the creation of a State Sustainable Transportation Implementation Plan Action focused on providing continuation of funding and technical assistance to RCPs and municipalities into a separate action. The overarching action is to create a State Transportation Sustainability Plan. That</p>	<p>Agreed and will clarify the text.</p> <p>One action is to create a state transportation sustainability plan informed by research on the connections in between Vermont's land use patterns</p>

	<p>plan would not continue funding the TPI or cause RPCs and municipalities to create their own transportation sustainability plans - that is something done separately.</p> <p>If maintained in the text the suggestion is that the requirement should be that regional and municipal plans should include transportation sustainability as a goal with supporting strategies, goals, etc. That could be accomplished through the normal update process and should not require additional funding or require the creation of separate sustainable transportation plans for each municipality (but rather the incorporation of those goals and strategies into existing required transportation plans).</p>	<p>and carbon emissions as well as the emissions cost benefit of state investments in transit, bike/ped and other non-single occupancy vehicle modes. The state plan would help guide future state transportation investment under the GWSA.</p> <p>The other action is for the regions and towns (outside of CCRPC) to develop sustainable transportation plans including investment priorities. The TPI-Program is one logical way to help fund the planning aspect of this work and coordinate it with all transportation planning. Increases in existing programs such as Better Connections, bike/ped funding and more will be needed to address local facility planning and implementation.</p>
11/7/2021	Suggests adding as co-benefit of TCI-P, and explain further in Pathway 1/Strategy 4 narrative, the ability to raise revenue to use as the state match required to secure federal infrastructure funds that can be used towards electric vehicle charging deployment, etc.	Comment recommendation has been incorporated into the text.
Non-Energy Emissions		
Date Received:	Comment:	Response to Comment:
10/31/2021	Do not believe fossil fuel sector emissions are currently (explicitly) captured in the Buildings/Thermal sector.	The Buildings/Thermal task leads did not identify the very small emissions from fugitive methane emissions as the highest priority for action.
10/31/2021	Review the Action Details for the Refrigerant Management Program (RMP) and ensure that we have the correct order of operations, and that this is indeed a priority action.	The section was updated to ensure it was clear that the evaluation of program design would be conducted prior to adopting the program.
10/31/2021	Would like to see emphasis placed on promoting energy efficiency measures at wastewater treatment facilities (WWTFs) as they are often the most energy intensive facilities in most communities. Potentially more impactful than flares.	We agree that energy efficiency at WWTFs is very important, and this is a recommendation that we propose for inclusion in the appendix. In the prioritization evaluation the CSM conducted, this did not rise to a high priority. Flaring does not have a significant impact, but it is a meaningful first step and very cost-effective.

11/1/2021	Helpful to have more discussion on details of GHG emissions reductions proposal in Global Foundries Self-Managed Utilities (SMU) PUC proceeding and how it will impact the electric sector recommendations. Also, more information on the ANR process if reductions are not sufficient.	The PUC proceeding is still in process, so it is unclear what the result will be. The Letter of Intent signed by the Public Service Department and the Agency of Natural Resources seeks emissions reductions from Global Foundries for their total emissions portfolio (electricity, thermal, and process). If that proceeding does not lead to emissions reductions or sufficient reductions, then the proposal is for ANR to set binding emissions limits through rulemaking.
11/1/2021	No actual action corresponding to the beneficial use of digester gas. Wonders if this should be done in conjunction with any/all resilience/adaptation improvements to facilities.	The action related to beneficial reuse did not rank as high priority in the evaluation the CSM conducted. It will be included in the appendix of additional actions.
11/1/2021	Creating an exemption for a private company from GWSA (and RES) seems both concerning, statutorily speaking, and like it will create a slippery slope for other private entities to seek exemption from emissions reductions. In the absence of holding each sector accountable for the statutorily-required emissions reductions, how will the Council propose "making up for" the lack of reductions from one sector? Putting additional pressure on another? Emissions reductions by sector were set in statute and specific sector preference (i.e. "ANR should develop emissions limits for semiconductor facilities...") stands in direct odds with the former. Not comfortable supporting a Global Foundries exemption from the GWSA.	The proposal and the Letter of Intent filed with the PUC does not consider nor create an exemption for Global Foundries from compliance with the Global Warming Solutions Act (GWSA). Global Foundries is required to achieve emission reductions just as all sectors within the greenhouse gas inventory are. The PUC proceeding represents an opportunity to achieve the same emissions reductions through an ongoing process rather than having to start ANR rulemaking from scratch. There would be no additional pressure put on other sectors as either way, Global Foundries would be required to reduce to the proportional amount as determined by the Vermont Climate Council in interpreting the GWSA.
11/1/2021	Ensure that Global Foundries is not being held to a different inequitable standard relative to other sectors and entities.	Global Foundries will be required to achieve proportional emissions reductions detailed in the GWSA and the Vermont Climate Council's interpretation of sector proportionality.
11/1/2021	Wonder if stronger language is needed around inability for municipalities to fund flares. My municipality CANNOT afford the necessary upgrades.	There are a limited number of communities around the state where this would apply, and the state proposes to work with those communities to understand what is necessary to return the flares to operational capacity.

11/1/2021	<p>Not as inundated in this as I should be to comment, but appears we are catering to one corporation for fear of job losses. This evaluation and prioritization has not been given to other companies or sectors as we consider regulations. Vermont is losing jobs everywhere for a number of reasons and can't understand why one corporation can be so important as to make their own rules as to whether or not they hit climate requirements. Farmers who couldn't meet clean water requirements are no longer around yet NWL employs far more people than Global Foundries and believe have a higher economic impact.</p>	<p>Global Foundries will be required to achieve proportional emissions reductions detailed in the GWSA and the Vermont Climate Council's interpretation of sector proportionality. The PUC proceeding is considering other factors, but the goal of CSM is to see if it's possible to achieve those reductions through the current proceeding. If it's not, then ANR maintains the authority to set binding emissions limits.</p>