				Task Group Priority Recommendation				
Recommendations	**Status**	**Revise Action, Revise Strategy, Remove, Keep as is**	**Revised Language**	**Notes**	**Technical Feasability**	**Cost Effectiveness (High/Medium/Low)**	**Co-Benefits (High/Medium/Low)**	**Impact (High/Medium/Low)**
			OVERARCHING SECTORAL POLICY					
			Pathway 1: Reduce greenhouse gas emissions from the Residential, Commercial, and Industrial (RCI) fuels sector via a broad sector-wide policy framework.	**New**				
			Strategy 1.1: Adopt at least one sector-wide mechanism to reduce thermal sector greenhouse gas emissions, recognizing that, regardless of the specific broad sector-wide approach, complementary policies will also be necessary to meet GWSA emissions reduction requirements	**New**				
			Action 1.1.1: Through legislation or administrative action, adopt a modified Clean Heat Standard, designed for gradual implementation,* and containing a cost cap provision with a starting price.** The recommendation is essentially to make progress now, within a program that is scalable over time, and that lives within a cost cap. *Gradual implementation implies that the mechanism would get as close as possible to GWSA targets and that complementary policies will necessarily need to carry a larger proportion of RCI emissions reductions to meet GWSA targets. ** DDA payment or cap articulated explicitly Implementation Lead:Legislature and selected State Agencies	**New**				
			Action 1.1.2: Through legislation or administrative action, join a cap-and-invest program, either New York Cap and Invest (NYCI) or Western Climate Initiative covering (but not necessarily limited to) Vermont's RCI fuels sector. Implementation Lead: Legislature and selected state agencies					
			BUILDINGS					
Pathway 1 (Buildings & Thermal): Reduce energy use in buildings by at least 25% through cost-effective and affordable weatherization and energy efficiency improvements, as well as through use and enforcement of energy codes.			**Pathway 2: Reduce greenhouse gas emissions associated with buildings and facilities through cost-effective and affordable weatherization and energy efficiency improvements, as well as through use and enforcement of energy and electrical standards and codes.**					
Strategy 1: Develop and implement a multi-year statewide Weatherization at Scale initiative		**Revise Strategy**	**Strategy 2.1: Ramp up implementation of the multi-year Weatherization (WX) at Scale initiative to meet the scale and pace of residential and commercial weatherization that is [*used in the Vermont Pathways model*] necessary to meet 2030 GWSA requirements**					
Legislature authorizes administration to coordinate WWG recommendations into Vermont Climate Action Plan.	Action not defined	**Revise Action**	Action 2.1.1: Through legislation or administrative action, ensure X additional homes are comprehensively weatherized by 2030, and secure the funding needed to achieve the target with a priority on low- and moderate-income households. *The weatherization work should recognize energy efficiency broadly. It should include traditional energy efficiency measures, electrical, health, and safety measures needed to comply with codes, and needed infrastructure upgrades such as wiring and service panels to enable electric vehicle charging, the adoption of heat pumps for space and water heating, and other strategic electrification opportunities* Implementation Lead: Legislature, Public Service Department	Funding from increase in Fuel Gross Receipts or via Thermal Energy Benefits Charge				
Adopt legislative or administrative recommendations made by the Weatherization at Scale EAN Action Team (WWG)	Being Implemented	**Revise Action**	Action 2.1.2: Through legislation or administrative action, ensure X additional commercial, industrial, municipal, and non-residential buildings are comprehensively weatherized by 2030, and secure the funding needed to achieve the target. Implementation Lead: Legislature, Public Service Department	Funding from increase in Fuel Gross Receipts or via Thermal Energy Benefits Charge				
Develop and implement a plan for coordinating and enhancing counseling services to Vermonters with low and moderate- income who could benefit from the State's energy savings programs (Public Service Department)	Being Implemented		Action 2.1.3: Through legislation or administrative action, secure a sustainable source of funding to be used specifically for eliminating barriers (e.g. required pre-requisite home repairs including, but not limited to, vermiculite removal, knob-and-tube mitigation, etc.) that prevent or delay weatherization activities from occurring in low- and moderate-income homes. Implementation Lead: Legislature					
			Action 2.14: Develop programs for implementation regarding 200-amp service and related building upgrades, coordinated with weatherization, efficiency, and equipment incentive programs (EV chargers, HP, storage, etc.), and ensure that any potentially related statewide program (such as Clean Heat Standard, if adopted, or enhanced weatherization efforts) includes building electrical upgrades in their design and funding models in order to enable decarbonization *Lead Implementers: Legislature for funding initiatives; Utilities, private sector, non-profits*					
Encourage utilities to develop and submit tariff on-bill financing proposals to fund efficiency investments to the Public Utilities Commission for review and approval pursuant to 30 V.S.A. § 209	Being Implemented		Action 2.1.5: Through legislation or administration action, secure upfront funding to comprehensively weatherize all municipal buildings and public facilities (including "weatherization ready" project needs) with priority for supporting/expanding existing programs (i.e. the Municipal Energy Resilience Program, Municipal Technical Assistance Program, Building Communities, etc.). Implementation Lead: Legislature					

Administration appoints lead agency to coordinate government workforce development efforts to avoid duplication of effort across state government	Being Implemented (Action Modified)			
Strategy 2: Institute a rental property efficiency standard (RPES)		**Remove**		
Authorize the adoption of efficiency standards for existing rental properties, allowing for an 8-year implementation plan, the first 5 years of which would be marked by significant education and funding to ease the implementation for property owners. This would be a relatively *modest standard. For example, the approach adopted for this purpose in Boulder CO, uses a point scale that roughly equates to the 1999 IECC. *For reference, in 1998 Vermont enacted a more stringent statewide residential energy code than what is being proposed here. that code was based on the 1995 CABO/MEC and Vermont amendments to the 2000 IECC.	No Action Taken	**Remove**		See Strategy 1.4
Strategy 3: Improve the energy performance of all new buildings in Vermont			**Strategy 2.2: Strengthen state-wide building energy standards and fund related education and code compliance necessary to meet the 2030 and 2050 GWSA requirements, consistent with pending Building Energy Code Working Group recommendations.**	
Regular update of the statewide residential and commercial building and energy codes by the Public Service Department culminating in a net-zero requirement by 2030	Advancing	**Revise Strategy**	Action 2.2.1: Regularly update the existing statewide residential building energy standard, putting Vermont on the path to to adopting Zero Energy Ready building energy standards for new construction by 2030. Implementation Lead: Public Service Department	
			Action 2.2.2: Regularly update the existing statewide commercial building energy standard, putting Vermont on the path to adopting Zero Energy Ready building energy standards for new construction by 2030. Implementation Lead: Public Service Department	
Develop and fund a state-level Energy Code Circuit Rider initiative that provides code training and enforcement assistance to municipalities throughout the state to ensure awareness of and compliance with existing and future building and energy codes (Public Service Department)	No Action Taken	**Revise Strategy**	Action 2.2.3: Develop and fund a state-level Energy Code initiative that provides standards, education and compliance assistance, and training to municipalities to ensure awareness of and compliance with existing and future building energy standards and/or codes. Implementation Lead: Public Service Department	EFG is implementing a grant-funded project
		Revise Action	Action 2.2.4: In alignment with the Act 47 Building Energy Code Study Committee's recommendations, through legislation action, consider designating the Division of Fire Safety (DFS) as the statewide "authority having jurisdiction" (AHJ) over all building construction (public, private, commercial, and residential): a. Empower the DFS to enforce Vermont's Residential Building Energy Standards (RBES) and Commercial Building Energy Standards (CBES). b. Give them the ability to raise funds to cover the cost of energy code adoption and administration through permit fees. c. Expand DFS's current database redesign to incorporate a statewide, central, publicly accessible repository for all Vermont buildings (including all residential buildings) that includes energy code data. d. Eliminate filing the certificate in town records and the notarization requirement. e. Establish a certificate application tool for both CBES & RBES that generates an energy standard "permit" before construction and a final certification upon completion that is part of the DFS database. Implementation Lead: Legislature	Note the DFS officially opposes this recommendation as it is not central to their mission.
			Action 2.2.5: In alignment with the Act 47 Building Energy Code Study Committee's recommendations, require the Office of Professional Regulation (OPR) to: a. Update the contractor registry so contractors explicitly acknowledge RBES/CBES legal requirements. b. Develop a certification designation for contractors trained on RBES and include the certification on the OPR Contractor Registry and DFS websites. c. Update the OPR website to make it user-friendly, alert consumers to contractors who are trained on RBES, and provide filtering functionality, e.g., by specialties, location, and certifications. d. Authorize OPR to update their contract requirements and template for contractor-owner agreements to include a clause acknowledging that energy codes are mandatory. Implementation Lead: Office of Professional Regulation	
			Action 2.2.6: Establish a role for EEUs to play in supporting energy codes compliance and incentives. Implementation Lead: Public Utility Commission	
			Action 2.2.7: In alignment with the Act 47 Building Energy Code Study Committee's recommendations, incentivize EEUs to support projects meeting "net zero" level of performance in their residential new construction programs. Implementation Lead: Energy Efficiency Utilities	
			Strategy 2.3: Expand the use of modern, energy-efficient mobile homes, enabling purchasers of new mobile homes to have quality housing with lower lifetime energy costs than standard mobile homes	
			Action 2.3.1: In alignment with the Act 47 Mobile Home Task Force recommendations continue and increase funding for existing programs that replace aged mobile homes or fill vacant mobile home park lots with new energy efficient models. Implementation Lead: Agency of Commerce and Community Development	

		Strategy 2.4: Increase and standardize the efficiency of rental properties in Vermont by incentivizing landlords to make improvements to their property.	
		Action 2.4.1: Direct the Commissioner of Public Service through legislation to explore the use of efficiency standards for multi-family rental properties more consistent with at least the 2015 International Energy Conservation Code (IECC) with amendments. Require a report by March 2026 on the impacts on housing costs, energy burden, and GHG emissions of adopting such a standard. Require recommendations from the Commissioner on whether to require such a standard in Vermont and, if recommended, which rental properties should be covered under such a standard. Implementation Lead: Legislature, Department of Public Service	
		EQUIPMENT	
		Pathway 3: Reduce greenhouse gas emissions through appropriate use of emission-based equipment standards	
		Strategy 3.1: Explore and potentially implement a regulatory requirement for new space and water heating equipment sold and installed in Vermont to meet a zero greenhouse gas emissions standard	
		Action 3.1.1: Conduct a study that considers the technological options and market feasibility for emissions-based equipment standards for various types of heating. The purpose is to better understand the feasibility and considerations of Vermont adopting thermal equipment emissions standard(s), either for oxides of nitrogen or, more broadly for GHGs. • Start by September 1, 2025 and file a report with the Vermont Climate Council by June 30, 2027 • The study shall consider: • adoption by other states, • the means by which equipment standards can influence market activity, • the most equitable approaches, and • how to secure the greatest emissions reductions Implementation Lead: Agency of Natural Resources, in consultation with the Department of Public Service	
		Strategy 3.2: Adopt a regulatory and/or performance-based approach that results in the use of lower global warming potential (GWP) refrigerants sold in Vermont.	
		Action 3.2.1: Work with key stakeholders to better understand the number and type of entities that would potentially be subject to a refrigerant management program (RMP) and the associated costs and benefits of an RMP (From Non-Energy Pathways recommendations). Implementation Lead: Agency of Natural Resources	
		Action 3.2.2: Work with key stakeholders to better understand and formulate recommendations regarding a regulatory or performance-based approach that results in the use of lower global warming potential (GWP) refrigerants in heat pumps sold in Vermont. Implementation Lead: Agency of Natural Resources	
		Action 3.2.3: Consider whether to require permanent leak detection systems for entities using over a certain threshold of high GWP refrigerants and if a cost share should be provided, with additional outreach through work with key stakeholders to better understand the number of applicable entities and the costs and benefits of such a requirement. Implementation Lead: Legislature; The Agency of Natural Resources	
		EQUIPMENT	
		PATHWAY 4: Reduce greenhouse gases by ensuring beneficial electrification of building space and water heating, with a focus on ensuring equitable access to cost-effective and affordable electrification by low- and moderate-income households.	
		Strategy 4.1: Encourage equitable adoption of electric heat pumps as replacements for fossil fuel heating and ensure access to beneficial electrification regardless of household income.	
		Action 4.1.1: Through legislation or administrative action, develop a long-term sustainable source (or sources) of funding to enable expanded outreach, consumer funding, and financing for the beneficial electrification of low- and moderate-income households, including home repairs and electricial wiring and panel upgrades needed in order to be "heat pump ready". Implementation Lead: Legislature, Public Utility Commissions (through Clean Heat Standard design and rules)	
		Action 4.1.2: Throught administrative action, ensure consumer protections are in place to ensure low- and moderate-income households do not experience increased service disconnections as a result of increased electrification of space and water heating. Implementation Lead: Public Utility Commission	

		Action 4.1.3: Through administrative action, ensure consumer protections are in place to ensure low- and moderate-income households do not experience increased overall energy costs and/or reduced access to federal or state fuel assistance support as a result of increased electrification of space and water heating. Implementation Lead: Public Utility Commission, Public Service Department	
		Action 4.1.4: Support the Deprtment of Children and Families to allow the disbursement of LIHEAP funds across multiple fuel types (at the individual household level). Implementation Lead: Department of Children and Families	
		Strategy 4.2: Institute regulatory or performance-based approaches to transition the water heater market in Vermont and ensure that water heaters models are able to be managed by electric utilities	
		Action 4.2.1: The Public Utility Commission, in consultation with the Department of Public Service and State electric distribution utilities, shall file a written report with the House Committees on Energy & Digital Infrastructure Committee and the Senate Committees on Finance and Natural Resources and Energy, no later than March, 2026, that addresses the feasibility of Vermont adopting an appliance performance standard requiring new electric water heaters for sale in Vermont to be manufactured with a modular demand response communications port or the capability of responding to an open communications standard, ensuring that all new electric water heaters are capable of load management. Implementation Lead: Public Utilities Commission	Needs neighboring states provision
		Strategy 4.3: Encourage integration of electric water heaters into Vermont's electric system and the timely adoption of utility programs to ensure that electric water heating loads are directly managed or controlled through time-differentiated price signals.	
		Action 4.3.1: Adopt legislation consistent with the provisions of Section 33 (Plug In Vehicle Electric Distribution Utility Rate Design) in Act 55 (2021) directing all Vermont distribution utilities to adopt propose demand response programs for electric water heaters, and to file electric water heating demand response tariffs with rates consistent with the criteria set out in Act 55 of 2021, Section 33, (c)(1)(A)-(D), (F), and (e) by July 1, 2027 for review by the Public Utility Commission pursuant to 30 V.S.A. § 225. The Public Utility Commission may grant a petitioning electric distribution utility an extension of the filing deadline. An extension may only be granted in response to a petition if the Public Utility Commission finds that the electric distribution utility's inability to meet the July 1, 2027, implementation deadline is due to a technical inability to implement demand response program, adverse economic impacts to ratepayers that would result from such implementation, or other good cause demonstrated. The length of the extension shall be directly related to the demonstrated need for the extension. Implementation Lead: Legislature and the Distribution Utilities in consultation with the Public Service Department, for review and approval by the Public Utility Commission	
		FUEL	
Pathway 2: Reduce building-related carbon emissions by reducing the carbon content of the fuels they use	**Revise Action**	**PATHWAY 5: Reduce greenhouse gas emissions by reducing the greenhouse gas intensity of fuels used for thermal Residential, Commercial, and Industrial (RCI) purposes.**	
Strategy 1: Implement a Clean Heat Standard	**Revise Strategy**	***Strategy 5.1: Create a market-based approach to reduce thermal sector greenhouse gas emissions***	S/b develop a market-based approach to reduce the greenhouse gas intensity of thermal fuels (e.g. a rate-based low carbon or clean fuel standard)
		Action 5.1.1: Through legislative and administrative action, adopt a performance-based Clean Fuels Standard that implements a declining carbon intensity (CI) score eligibility requirement for residential, commercial, and industrial (RCI) fuels and can be implemented gradually alongside other complementary policies that would be necessary. Implementation Lead: Legislature and state agencies	
Adopt legislation authorizing the Public Utilities Commission to administer a Clean Heat Standard consistent with the recommendations of the Clean Heat Standard Working Group	**Revise Action**	Action 5.1.2: Alternate approach if recommended action (5.1.1) is not deemed feasible (not performance based) : Through legislative and administrative action, institute a minimum percentage clean fuel blending requirement for all residential, commercial, and industrial liquid and gaseous fuels, utilizing an approved list of eligible clean fuels. Implementation Lead: Legislature and state agencies	
Strategy 2: Transition the water heater market in Vermont to ensure the availability of water heaters whose total cost of ownership is lower than other models, and which can be controlled by electric utilities to help manage their power grids at low cost.	**Revise Strategy**		See strategy 4.2
Through legislation, with neighboring states, require electric water heaters for sale to have a modular demand response communications port	**Revise Action**		See action 4.2.1
	New Pathway	**PATHWAY 6** **Optimize GHG emissions reduction requirements and energy equity in electric, gas, and energy efficiency utility regulation.**	

New Strategy

New Action

Strategy 6.1: Consider changes to regulated utility performance metrics to include GHG emissions reductions and energy burden reductions so as to more cost-effectively achieve Vermont's legal GHG reduction requirements and energy-equity goals.

Action 6.1.1: Through legislation direct the Public Utility Commission to open a case that examines existing regulated utility performance metrics and considers whether changes to those metrics to optimize greenhouse gas reductions and energy burden reductions for Vermonters with low- and moderate-incomes would promote state policy goals.

Implementation Lead: Legislature, Public Utility Commission

CROSS CUTTING

PATHWAY 7

Recruit, train, and retain the workers and support the businesses necessary to implement Vermont's thermal sector energy transformation.

Strategy 7.1: Increase coordination among multiple state agencies, workforce development entities, public education institutions, and employers to ensure the scaling up of the workforce needed to achieve the GWSA requirements. This will require a substantial ramp up in workforce recruitment, training, placement, and retention involving multiple public and private entities.

Action 7.1.1: Complete the development of the Weatherization Workforce Training Center currently underway under the leadership of the Weatherization Workforce Training Center Steering Committee.

Implementation Lead: Office of Economic Opportunity, Vermont Energy Investment Corporation, Vermont Works for Women, Vermont Technical College, ReSOURCE, Vermont Adult Learning and Vermont's Adult Career & Technical Education Center