Written Comments: Climate Action Plan Update

May 15, 2025

Topic Areas Color Coding: •Buildings & Thermal, •Transportation, ○Electricity, •Natural & Working Lands, •Equity & Justice, •Resilience, •Policy/Law, •Housing, •Biofuels, ○Affordability, •Health

Transnational Environmental Law Clinic, Vermont Law and Graduate School *(submitted by Emmanuel Omirin)*
Topic areas: •Natural & Working Lands, •Equity & Justice, •Resilience

Public Comment on the Climate Action Plan – Inclusion of Nature-based Solutions Definition and Evaluation Criteria

The Nature Conservancy in Vermont *(submitted by Drew Watson*)
Topic areas: •Natural & Working Lands, •Resilience

Climate Action Plan – Public Comments on Freshwater Issues

Betsy Taylor, New Haven
Topic areas: •Natural & Working Lands, •Policy/Law, •Transportation

If I could've testified, I would have encouraged the commission and Council to maximize what we can do through nature. The UN has declared this The decade of ecological restoration. We must sequester and store carbon. Yet few private or public entities are investing in the strategy. I would particularly encourage support of Amy Sheldon's bill and the effort to leave 9% of our forests untouched with the capacity to store carbon for hundreds of years. I would also encourage incentives for healthy soils to sequester carbon. Within the transportation sector, I would encourage investment in universal adapters and charging stations for EV's. and finally for the overall approach to monitoring, greenhouse gases, and setting up a system for capping emissions, and investing those profits I would speak to the California Department of natural resources and the California air resource board since California is now aggressively updating their cap and trade greenhouse gas policies under governor Gavin Newsom. They are strengthening what they're doing and Vermont should be a front runner with California. I chair the board for Dr. James HANSEN, the former chief climate scientist for NASA. I live in New Haven Vermont.

Vince O'Connell, Craftsbury
Topic areas: ○Affordability, •Policy/Law, ○Electricity, •Buildings & Thermal, •Transportation

Public comment on Cap and Invest Programs and additional recommendations

Vermont Electric Cooperative, Stowe Electric Department, Washington Electric Cooperative, Vermont Public Power Supply Authority, Burlington Electric Department *(submitted by Andrea Cohen)*
Topic areas: ○Electricity**,** •Resilience, ○Affordability, •Transportation

As the Vermont Climate Council works to finalize the list of priority actions to be included in the 2025 Climate Action Plan, we would like to offer some comments for your consideration based on the April 2025 priority action slideshow. These comments follow on the discussion representatives of electric utilities had at the invitation of the Cross-Sector Mitigation Subcommittee several months ago, prior to release of these priority actions. Our comments are informed by our experience and perspective as key entities in the implementation of our current electrical system and our commitment to a clean, affordable, and reliable energy future. We agree that beneficial electrification and other meaningful actions are essential components for success and we offer these comments in the spirit of equitable, effective, and sustainable action.

Please note that not all of the signatories agree with every listed comment included below. Our goal with these comments is to highlight the recommendations for which some of us have identified issues with assumptions, data, or expected outcomes. You may also hear individually from some of the individual utilities on some of these points. Please be in touch if we can offer additional detail or explanation.

Comments on Draft Priority Actions

- Vehicle Electrification (Cross Sector Recommendation 2):

  o EV funding (2.ii): The plan identifies long-term and consistent funding for EVs for income qualified Vermonters. Additional EV funding for income-qualified Vermonters to complement existing utility Tier 3 and other incentives, will be necessary in the near-term, particularly given the potential for federal rollbacks on incentives. It would be beneficial if the plan specified where this funding will come from and what the trigger will be to initiate the end of the incentive program. Having a program end date would be fiscally responsible and may even help facilitate funding.

  o Charging Infrastructure (2.iii) The plan should identify the funding source for Electric Vehicle Supply Equipment (EVSE). It should be noted that while some distribution utilities fund EVSE and own/operate it, many of Vermont's distribution utilities do not currently fund EVSE and have no plans to do so given revenue limitations or policy position about what rate-payers should be responsible for. Additionally, if state funds are used for EVSE in partnership with private entities, the state should have oversight on the rates being charged to consumers who use the publicly funded infrastructure. It should also be required and enforced that publicly funded equipment is appropriately serviced and maintained.

- Load Management, Grid Hardening, Metering, Storage, Generation siting, Rate Design, and Distributed Generation. (Cross Sector Recommendation 4):

This is a packed and all-encompassing recommendation and it is unclear what new or different actions are being contemplated. We support "continued PUC oversight" as stated and we recommend explicitly adding that the current structure and oversight is working well and no change is being recommended. We do believe that generation and infrastructure siting, as well as system maintenance and reliability, might benefit from regulatory reform as discussed elsewhere.

- Act 179 and Community Solar (Cross Sector Recommendation 5):

We note that the draft states the review and implementation should be "as appropriate" and may be accomplished through utilities directly, not just mandated. This is important because we do not support a mandated community solar procurement program. We do support incentives, such as the ACRE program, to incentivize community solar programs. The Act 179 report does not articulate a sustainable or equitable financing component for the program it proposes. We appreciate the note about the funding not being from electric rates, and we believe the essential first action step would be for a financial proof of concept to be performed before a program mandate is even contemplated.

- Ensure the grid supports customer electrification. Highlight importance of cost-effectiveness and equity in design, implementation, and affordable funding. (Cross Sector Recommendation 6):

Vermont's distribution utilities work hard to cost effectively support electrification through our Tier 3 energy transformation programs, while balancing energy equity, grid reliability, safety, and all other services and requirements. We believe the Tier 3 regulatory program should offer increased credits for storage, load management, and other work in rural and low-income communities.

- Secure Funding for Electrification for low- and moderate-income households (Cross Sector Recommendation 10; also mentioned in Recommendation 8):

This is an important and essential action step. The plan should specifically note that any funding for these priorities should not disincentive electrification or create rate class cross-subsidization.

- Accessing Private Capital/ On-bill financing (Cross-Cutting Issues Recommendation 14):

The recommendation references on-bill utility financing as a strategy to explore. We note that based on our experiences on-bill financing is not proving to be an effective strategy with very limited customer uptake. The recent experience with the WRAP Tariff, directly relevant to this recommendation, shows that. The considerable set up cost coupled with the low uptake does not warrant inclusion in the action. Given this, additional tools to support rental property weatherization and electrification may be needed to overcome split incentive issues.

- Grid resilience planning/ Utility Integrated Resource Plans (Rural Resilience Recommendation 6):

Grid resilience planning is already part of our core work; the plan should recognize this. Many utilities believe the current IRP requirements are too burdensome and are ripe for reduction and reform. As you work to prioritize recommendations, more IRP requirements are not supported as a priority action. What would be extremely helpful would be funding for grid hardening projects.

- Resilient Electric Infrastructure (Rural Resilience Recommendation 9):

Upgrading, undergrounding, and moving lines are part of our core work and this work requires financial resources. The plan should recognize that the more we can reduce other non-strategic cost pressures on electric customers, the more work we can do in this space.

- Regulatory Incentives for New Generation. (Ag & Eco Recommendation 9):

In general, we support streamlined permitting for strategically located new generation of all types. Diversity of resources, beyond solar, will be critical for a cost effective and reliable power supply. To the extent this recommendation as framed would limit or not support that, or create greater customer-borne costs, utilities would not be supportive of it.

- Biomass (Ag & Eco Recommendation 15):

While a lifecycle analysis of the carbon benefits and limitations of wood energy may be helpful, and should be considered alongside additional issues such as supporting appropriate managed forestry practices, the state's updated 2024 Renewable Energy Standard (RES) (which enjoyed broad support amongst a variety of stakeholders including environmental organizations, renewable energy developers and utilities) provides a balanced approach to utilities procuring a diverse mix of renewable resources to meet our customers long-term needs.

We note that existing wood energy plants are included as a resource in that RES policy, recognizing they provide some unique characteristics that complement other renewable resources. In addition, under the 2024 RES, new plants would be required to meet very stringent efficiency and environmental standards and no such plants are proposed. In addition to analysis referenced above, state support for efforts to help existing plants become more efficient, reduce their environmental footprint, and support innovation are welcomed.

Other items some of the utilities note that are worthy of more consideration include

■ Continue to work to ensure the cost of net-metering is not greater than the value it brings to the system (financial pressure, energy equity, carbon reduction).

■ Support of resource diversification through prioritization of new wind energy in the state and region.

■ Coordination with regional partners for scrutiny of regional transmission projects to ensure they do not drive up electric costs for Vermonters and serve as a disincentive for electrification.

■ Ensuring Vermont continues to have access to EV inventory in-state as well as options for electric heavy-duty trucks from manufacturers as more municipalities and utilities look at electric bucket trucks, recycle trucks, fire trucks, etc. (California's clean cars and trucks rules as example).

In sum, we believe our work in the electrification space has contributed significantly to lower emissions. We urge you to continue to prioritize recommendations to ensure that additional costs are not put on electric ratepayers that would create disincentives to electrify. We also caution the Council that layering new beneficial electrification programs on top of existing programs may cause inefficiency at best and conflicts at worst. Before new programs are created it will be essential to fully understand potentials for inefficiencies and conflicts. At this time of competing resources, we need to make sure that all investments are strategic.

Renewable Energy Vermont *(submitted by Peter Sterling)*
Topic areas: ∘Electricity

Renewable Energy Vermont Comments on the 2025 Update to the Vermont Climate Action Plan

Alex Messinger
Topic areas: ∘Electricity

In this item on page 6.

4) Support cost-effective load management, grid hardening, and optimization, e.g., through advanced metering, storage, targeted siting of generation, rate design, and distributed energy resource management systems statewide to enable customer programs and avoid or delay more expensive physical upgrades.

I would like to see the speed of projects increase. I've talked with solar developers in-state who can't get projects built because of delays and inability to secure funding because of those delays. This doesn't mean that we're ignoring public input, but speeding things up. It's critical to expanding our renewable energy infrastructure. Critics may note that non-renewable projects may also enjoy faster approval. I think we need to look at the overall net emissions as a result of permitting reform. The vast majority of projects awaiting approval are renewable, so I believe there will be a significant net reduction in emissions.

Nick Allen
Topic areas: ∘Electricity

I work at the St. Johnsbury Academy as their Composting and Recycling Person.I studied sustainability at Lyndon State College, specializing in Solar Energy. I was on the sustainability Club in the spring of 2011. Professor Miller stated that in one hour the sun produces more Energy than all

the Coal, Nuclear, and Natural Gas combined. That the sun has seven times more Energy than the earth needs. I also studied Environmental Science at the St. Johnsbury Academy. I do not back the current administration's energy plan. Climate Change is real! We are dealing with historic flooding in Vermont, droughts in California which are leading to Wild Fires! The Pope in Rome has stated that Climate Change is a threat to Civilization. I want to see Wind Towers and Solar panels in this state. We can not depend on Canada to provide us with electricity. I want legislation in Sutton that allows us to put up wind Towers. This is a multi Billion dollar industry and we are not using it. The eyes of history are watching, we must act for our Children's future! A hundred years from now historians will look at what he did and judge our actions. Thanks for reading this!

Bettina Miguez, South Burlington
Topic areas: •Buildings & Thermal, Education, Workforce, •Health, •Resilience, •Natural & Working Lands

VT Climate Council Draft Priority Actions – April 2025 Comments

Dee Myrvang, Manchester Center
Topic areas: •Health, •Resilience

Hello. I appreciate the opportunity to submit comments on the Vermont Climate action Plan. As a State employee who works in health preparedness and response, I have been mostly focused on Rural resilience and adaptation. Cross-sector applies to all as we do not have County government to work on things like regional resiliency hubs. we struggle in Vermont to do many things because our towns do not have the resources to do this alone. First of all there needs to be a consistent funding stream to assist towns and regional areas to take the data and understand the greatest needs. education on the basic needs to protect Vermonters such as flood insurance must start somewhere. Can we show data of the different towns and the progress being made with heat pumps and such? Can we show the towns that have flooded and some of the best practices? I am on a Health Climate Change Workgroup and we struggle to find the best practices in Vermont, but also examples of resiliency hubs and such for rural America. Education, education, education. We need more residents to sign-up for FEMA flood insurance (only 1% of Vermonters have)

Stuart Barlow, Bennington
Topic areas: •Resilience

Instead of spending millions on reducing carbon emissions which will have no measurable effect on climate, focus on engineering and implementing solutions that would mitigate the effects that extreme weather events will bring us.

Brian Forrest, Williston
Topic areas: •Biofuels

The most important idea that the council must grapple with is the misconception that it is okay to burn wood to solve the climate crisis.

CO2 comes from burning plants - in any form: coal, oil, gas, wood, grasses, etc. They all contribute CO2 into the atmosphere. The biomass industry would have us believe that burning wood is somehow okay, because it's "renewable". And this is true, it is renewable, but it is useful to the climate issue only if we have the 50 -100 years for that tree to grow back. If we don't, it's just adding to the crisis. "Renewable" is not the answer, it has other factors that have to be considered: do we have the time frame for this to work; is it sustainable or is it taking land away from food crops that are seeing reduced yields with the warmer weather.

The IPCC has given us less than 25 years to cut our emissions in half, so we don't have that 50-100 year time frame to solve the crisis this way.

What makes matters worse is that trees are the ONLY instrument we have that can reduce the CO2 in the air in scale. So not only are we adding CO2 to the atmosphere, we are removing the very thing that can help us out of this crisis.

Please don't be fooled by an argument that makes no sense. A plant-is-a plant-is-a-plant and burning them in any form is the cause of our heating planet.

Lily Snow
Topic areas: •Buildings & Thermal, •Transportation, •Biofuels

I believe the single important issue (OMG there are so very many!) is lowering CO2 as quickly as possible. Quickly! That means to stop/greatly reduce burning anything - oil, gas, wood. That means 'NO' to biomass (trees will never grow fast enough to compensate! Don't even 'study' the industry- it's dirty). Yes to EV incentives. Yes to weatherization of homes actions.

Lisa Moir, Westminster
Topic areas: •Biofuels

DO NOT include wood pellets.... As a Renewable resource ... in the plan. Calling them Bio- Fuel is GREENWASHING! These pellets were originally made from upcycled/ scrap materials. That is long gone They are now Logging Forests for the production of pellets. And we are subsidizing this! The county foresters... are an arm of the tree companies/ loggers... and the pellet manufacturers... It's ALL CARBON intensive

Walter Klinger, Pownal
Topic areas: •Transportation

Comments on the Vermont Climate Action Plan