

**From:** [Bruce Lierman](#)  
**To:** [PSD - Comprehensive Energy Plan](#)  
**Cc:** [Brian Campion](#); [Richard Sears](#); [dwhitman@leg.state.vt.us](mailto:dwhitman@leg.state.vt.us)  
**Subject:** Comments on the Draft CEP 2022  
**Date:** Sunday, December 5, 2021 4:45:46 PM

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Included below are my comments in response to the Draft CEP 2022.  
Thank you for this opportunity to comment.

1. It is difficult to imagine improvement in energy costs and services equity being advanced in Vermont, and the nation as a whole, without meeting the climate standards set out in 10 V.S.A § 578, and consistent with the Vermont Climate Action Plan adopted and updated pursuant to 10 V.S.A. § 592. Failure to meet these standards will impose, and is imposing, unequal energy and environmental burdens.

2. We can have little influence on the equity and efficiency of renewable energy sources beyond our borders, especially if we do not invest in local renewable resources that provide us with choices in our renewable energy portfolio. The more dependent we are on outside suppliers, the less discretion we have in making our decisions based on equity and efficiency. This will be as true with renewables in the future as it has been with fossil fuels in the past. If we increase our dependence on outside energy suppliers to the detriment of our in-state resources, we will be less likely to consider the impact of those outside sources on indigenous populations and the global environment. The State of Vermont is already failing in this obligation, as required under GWSA, Act 153, Sec. 3. 10 V.S.A. § 578: GREENHOUSE GAS REDUCTION GOALS REQUIREMENTS: “(a) Vermont shall reduce emissions of greenhouse gases from within the geographical boundaries of the State *and those emissions outside the boundaries of the State* (Italics added) that are caused by the use of energy in Vermont as measured and inventoried pursuant to section 582 of this title....” No audit of the carbon footprint of outside suppliers has taken place as of this date. How can an effective comprehensive energy plan be written without examination of the environmental impact of our outside suppliers?

This requirement goes to the heart of the stated intent of this plan; to address energy needs in a manner that is “adequate, reliable, secure, and sustainable”. In order to meet these goals, we need regulatory oversight of the great majority of our production and distribution resources, which we can only exercise with in-state resources.

3. It is a long and tenuous link that connects energy production and distribution with economic and social justice. There certainly is such a link. That link passes through our concepts of property, taxation, and commonwealth. To attempt to establish an equitable means to produce and distribute a KiloWatt of energy requires a willingness to entertain new models of ownership and economics more than new models of electrical engineering. Attempts to achieve equity without using these more direct levers of justice are doomed to

failure, especially if they impede our existential need to reduce carbon emissions.

4. I find the brief discussion of plans for “renewable” and other forms of natural gas production and consumption ominous - and familiar. Certainly there will be a need for concentrated energy fuels, particularly for transportation use. But this discussion sounds like the latest form of the glib delusion that we can anticipate an energy future just like our past, only with different, magical fuels. Nuclear power, Hydrogen, Renewable Natural Gas - all have been talismans, which, as long as they can be dropped into conversations without explanation or critical examination, provide the momentary comfort that we really won't have to change too much in our future energy use.

5. It is certainly true that “Clean energy technologies, which can reduce costs and energy burden, are generally less common in areas with the highest energy burden”, as reported by Efficiency Vermont. These discrepancies are at the heart of this report's focus on energy equity. This fact challenges us to eliminate barriers to these technologies in these areas, not to curtail the deployment of these critical technologies. How can we provide the advantages of these technologies, especially to those with high energy burdens? Clearly, it is not a characteristic of the technologies themselves that results in this inequity; it is the failure of political will to address this injustice that perpetuates it.