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To: PSD - RE Programs
Subject: Comments on Plan
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Comments on Vermont's draft Energy Plan

As a consumer who is not well-versed in the deeper aspects of energy policy, my comments will reflect my own struggle to read what is a pretty dense and very long planning document. I can't comment on all aspects of it. That in itself may point out the need to better articulate energy issues with more precise ways to engage citizens and encourage comments. It also appears to me that this energy plan is in some cases contradictory—such as striving to reduce electricity consumption (or is it just reduce electric rates), at a time when reducing fossil fuels may necessitate using MORE electricity ala EVs or heat pumps unless there is an unstated aim to somehow *ration* energy resources.

Timelines: While I understand the mandate for a 20-year plan, some flexibility is needed in the plan pieces as they are affected so much by funding availability or global and climate-related conditions. That said, the implementation dates stated by the planners may be too ambitious for some portions of the plan—perhaps the deadline for fossil fuel reduction from home heating, or reforming electric grid items without funding sources (not identified in the document.) Just the adoption of EV's in Vermont, may be a challenge given supply chain, price points and grid capacity. The most immediate focus should be to reduce the most carbon-dense/wasteful uses of fossil fuels in the shortest time.

Stakeholder Information: Information about energy, climate change and how it affects Vermonters is very confusing right now. Incentives for various programs are hard to figure out We stakeholders get information in different ways and some have not been targeted in ways that make sense for them. Communication should be better discussed in the plan. Power bill inserts and general news releases are not adequate. Tenants and landlords (including but not solely low-income/elderly housing users/owners), behind-the meter solar homeowners, rural businesses or housing developers all have different needs for information. Utilities should be charged with finding better ways to engage consumer groups in their service areas and submit plans to the PUC. Likewise fuel sellers should be getting and sharing pertinent information with their customers. This plan could suggest influencers/ advocates to help with this. Funding for information tasks from the State could mean that events, social media, direct mail, and television ads could be better utilized. In the case of comments on a plan this size and breadth, it may be that the information itself needs to be planned and presented in segments.

Thermal Energy-Include better discussion on converting multi-family housing to non-fossil fuels emphasizing a step up in weatherization that also targets manufactured housing developments. Very little mention is made of innovations for energy reduction/conversion, yet heating is one place where innovations are needed. Discuss needs for funding community wood chip or pellet boilers with heat pump units in mobile home parks Discuss ways to incentivize shared thermal systems (including solar) for closely spaced housing or mobile home parks. Perhaps partnerships with businesses and housing to better utilize thermal resources for example. Discuss support for development of additional wood pellet production facilities in-state for thermal needs and provide local jobs.

Transportation:. We talk about EV's and State support for them but they are very expensive, hard to get and it is not clear how and where to get them charged once you have one. As a Senior Citizen, I wonder if it is even worth it to invest in one. As for serving the transportation needs of low-income residents, I support planning for individual EV's, but not letting the perfect get in the way of the good. Perhaps the short-term goal is getting reliable safe clean and efficient transportation by first prioritizing EV innovation in public transit. Address ways for "shared' or leased EV vehicles in multi-family, low-income housing or programs for E-scooters or bikes for commuting young adults.

We talk about EVs *without* discussing about the need to help support highway infrastructure and other costs that may have to be levied to do this without a gas tax. Most consumers may not understand the costs for charging or converting home power systems to accommodate EVs. There has to be accessible information on the future costs for EV infrastructure at the all level on a continuing basis.

Electric Utilities: We hear about "Smart Grids," but the information from utilities doesn't make it sound as if they will be utilized to decentralize power generation or create robust transmission nodes, but rather as a Big Brother way for utilities to track usage for billing and to control consumer appliances. WE NEED A STANDARD DEFINITION TO TALK ABOUT SMART GRIDS AND HOW THEY WILL BE USED IN VT! Consumers need to understand how these technologies will make operations more efficient, and any issues related to privacy and costs.

Vermont needs to assess the risk of utilities continuing to use some expensive, high-hazard structures including the Green River Reservoir Dam that may provide little power with high liability mainly for the RECs they provide.

Rate Setting: I'm disturbed by the statement in the plan that Rate Design is more of an art than a science. This does not inspire faith in either the commission or the administration by utilities. In this age of technology, It makes the whole rate setting system seem like a free-for-all scheme sanctioned by the PUC!. The plan states that it wants to reduce electric rates, but If you compare the rates to other charges statewide and especially customer charges from some of the utilities,, it sometimes seems like it will just be a re-labeling of rates to be "customer charges" We expect rates to go up, but the system of determining what customers will pay seems inequitable from the start.

The dependence on Customer Charges to fund fixed costs, especially regressive for rural customers seems terribly inequitable for those served by WEC or Hardwick Electric in particular. Infrastructure costs need to be transparent and reasonable and not include a lot of administrative costs. Perhaps the PUC should call for a third-party auditing of all utilities in Vermont to determine the actual costs as a start towards equity for customers. There is concern that opportunities for broadband services may benefit users, but also be an opportunity for utilities to lard on extra charges in the future. Pairing these services needs to be addressed.
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Efficiencies in Administration: There's no discussion of improving the *efficiency* of utility administration. For example, would costs for consumers be lowered with a consolidation of some power entities? Why couldn't the existing Coops VEC and WEC merge to better serve most of the northern part of the state, reduce administrative costs and equalize services? How can community power companies be more efficient, and forward thinking, especially if they depend on power sources that may have to be phased out (like hydro) or present high cost in the future? We know some service areas have more low-income customers and longer distribution networks than others—could we use Vermont's Education funding model to spread out costs more equitably between some power generators using state taxes or fees? It would equalize costs to low income consumers if all utilities shared in the costs of lines and maintenance statewide which could in turn encourage business development in more communities.

Solar: We are told that behind the meter solar generators are costing everyone money, yet from a siting standpoint, private small solar systems are the least likely to build on prime ag or forest sites and most likely to utilize backyards and rooftops. The plan could encourage utilities or private concerns to somehow aggregate the smallest solar users to make them more efficient, especially on rural roads where their power could help with the grid loads. Promote batteries to help smooth out peak production and demand and insist that access to them be equitable. If utilities themselves invested in properly-sited solar farms and leased panels to customers, it would make solar more affordable to those who can't invest in rooftop or backyard arrays. Again, locating solar installations near mobile home parks with panel lease options for homeowners could help more low income Vermonters utilize solar.

It may be time to adjust the credits that behind the meter generators receive for excess power, but rates need to be fair and enable homeowners a reasonable payback time for their investments. (Why do utilities offer *credits* instead of kilowatt-to-kilowatt exchange like they do in Maine?)

If there is truly no way to reconcile behind the meter costs to utilities, the utilities should help generators find strategies to better self-use or redirect some of their excess electrons directly to other users to reduce the amount of excess power and the timing of that power sent to the grid. Perhaps a non-profit 3rd party could purchase excess power and resell it to other buyers or better programs for selling or leasing home storage batteries.

REC's: Very few consumers understand the whole REC program, but it needs to be re-examined which is likely beyond what this Vermont plan can do. There should be large negative RECs for high hazard hydro dams that are close to the end of their useful life. We should require plans to retire them and replace the power from them.

Business: The plan should address how proposals from large users like Global Foundries to negotiate for their own power rates would adversely affect all Vermonters electric rates. What impacts on this plan would occur if a new high energy-demand business were to propose to re-locate to Vermont? Can we encourage more businesses that have their biggest power usage during the season when Vermont does most of its self-generation? We already have seasonal businesses in recreation, maple sugar processing and perhaps some types of ag production. In the old days wood processing was partially seasonal due to water flows. But could we attract businesses that have their peak power demand during the summer, or come to Vermont for summer production of some aspect of their business? I realize this is outside the scope of this Plan, but it is certainly a concept that might augment our economy and if predictable, help utilities to plan for demand when they can best fulfill it.

Thanks for the opportunity to comment.

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