



Introduction:

Encore Renewable Energy (Encore) appreciates the opportunity to comment on the Request for Input on the Comprehensive Review of Vermont's Renewable & Clean Electricity Policy and Programs. We are concerned that without bold and strategic action in rethinking Vermont's Clean Energy policies, Vermont will fail to achieve the clean energy goals it has now codified in statute and lose a significant economic opportunity to neighboring states in the process.

Timeline and Stakeholders:

Encore is supportive of the Department of Public Service's (the Department) proposed seven month study duration, however, Encore would call on the Department to consider the urgency of the climate crisis, and how the status quo of permitting solar projects in Vermont fails to take that urgency into consideration.

In this moment, Encore is advocating strongly for bold and transformative action. There is no debate on climate science and the evidence is devastatingly clear that Vermont and the world need bold action on climate now. This is an existential crisis we face and Vermont needs to prioritize solutions and actions over process for the sake of process. The Department and the Administration know which solutions are viable and actionable for Vermont in the near term and adopting these solutions quickly will be critical to mitigating some of the worst impacts of climate change in our state. We encourage the Department and the Administration not to become sidetracked by unsupported claims from groups who are unable to face the realities of the climate crisis.

Encore echoes Renewable Energy Vermont's (REV's) point that Vermont's youngest residents will face the greatest impacts from climate change, as they will be the ones who grow up in a world impacted by our decisions. Encore also supports REV's position that the Department's outreach efforts should focus on those who are most impacted by climate change, including low income Vermonters, BIPOC communities, and individuals most adversely affected by climate change. We encourage the Department to leverage technology (e.g. social media and virtual meeting tools) to reach and engage with individuals not able to attend in person events, particularly Vermont's youth.

Decision Criteria

Encore advocates that the highest priority decision criteria should be quick and efficient greenhouse gas reductions, achieved by programmatic and policy changes directed to expanding renewable energy resources in Vermont. The Department's RFI identifies equity, cost-effectiveness, carbon reduction, grid impact, economic development, and simplicity as important criteria to be evaluated in considering opportunities to expand the



use of renewable and clean electricity resources in Vermont. Encore sees all of these factors as critical and supports these considerations as the Department initiates this process. However, we would urge the Department to broaden its analysis when considering “cost-effectiveness” to include societal and environmental costs as well.

Key Issues for Consideration:

- **In-State Additionality.** Encore is advocating for a RES which prioritizes new in-state renewable energy generation at scale. Encore also advocates for prioritizing bundled RECs in the RES which would have the potential to greatly increase the focus on in-state renewable energy by Vermont utilities. Tier I of the current RES, which does not include any age/size/technology criteria, fails to fully consider additionality. Therefore, the Tier I requirement is currently being met in large part by unbundled environmental attributes from out-of-state hydro facilities. This is inconsistent with the RES/RPS standards of other New England states.
- **Grid Improvements brought to utilities and customers by developers.** Every solar project which Encore has developed and delivered in Vermont has incorporated robust and value-adding improvements to Vermont’s distribution grid. The Developers pay for these upgrades to existing infrastructure, and these improvements bring increased resiliency and reliability to the communities in which these projects are located. The development community has brought in millions of dollars of private investment into Vermont which has been used to build out these grid improvements, at no cost to the ratepayer.
- The impact of the termination of the Standard Offer Program in Vermont.
- **Recruiting and retaining a talented workforce.** A Clean Energy Standard which focuses on new/additional in-state clean energy projects would **attract young workers** and innovative new companies and industries to Vermont
- Both existing and potential Vermont electric customers, industrial and commercial, are seeking **pathways to low carbon energy** either by choice or corporate mandates. If Vermont does not make changes to the RES in the near terms to create these pathways for the delivery of clean, in-state renewables to those customers, those businesses will move to other states that are already providing those programmatic pathways.
- **Grid Modernization**, including storage, aggregation, and load management. All of these grid improvements need to be accessible to the development community in order for Vermont to realize its renewable energy goals. Encore also advocates for a pathway to a more holistic approach to **cost sharing for these improvements** between the developers of clean energy projects which bring a host of improvements to the grid, and the utilities which have the ability to provide these types of services to customers and to renewable energy providers.
- A RES which prioritizes new in-state renewable energy provides **energy security** for Vermonters, in all rate classes. Our nation, our state, and our world is now experiencing yet another global energy crisis, and exposure to out-dated and



incumbent business models built around fossil fuel energy sources will only continue to threaten our energy security as a State and as a Nation. The Administration prioritizes focusing on the vulnerable, making Vermont more affordable, and growing Vermont's economy. Energy security for Vermonters is critical for all of these priorities.

- **A true focus on Climate Change.** Any solutions which are designed to focus only on near term cost considerations rather than addressing the true costs of climate change are not going to be effective tools in the long term. Failing to invest in renewable energy now will ultimately create higher energy long term energy costs to Vermonters.

Additional Comments:

Over recent years, Encore has encountered many Vermont businesses seeking to source local, clean energy to provide for their operations or facilities in Vermont and as part of a larger decarbonization strategy. These companies want clean energy now and there is not currently a programmatic or statutory pathway for this in Vermont. In an attempt to address this gap, Encore has created innovative pathways and commercial arrangements that enable these businesses and energy users to procure clean energy in-state. However, in the absence of a RES which prioritizes these types of in-state generation projects, these types of projects will stay limited in capacity and quantity.

Changes to Vermont's RES, which focus on prioritizing these new in-state clean energy projects, would incentivize and enable a substantial pipeline of projects and help Vermont on its way to achieving its climate targets. These projects would show how Vermont is a leader in renewable energy, bring new businesses to our state, provide low and stabilized energy costs to Vermont communities and businesses, provide energy security to Vermont, and create a model for others to follow.

However, these climate and energy impacts are only part of the story. These renewable projects can provide substantial income to landowners and farmers. In many cases the additional income from these projects enables families to keep land or farms in the family for the next generation and in active agricultural use. The projects also help towns meet their energy goals and they provide valuable local tax revenue, as well as contributing meaningfully to the State Education Fund through Vermont's Uniform Capacity Tax. Encore has committed to planting pollinator-friendly ground cover on projects where possible, which benefits agriculture and the environment by providing critical habitat for endangered pollinators that are in steep decline in Vermont and around the world. We are also working with the American Solar Grazing Association to develop a model for farmers to graze sheep on the land where our projects are located, which keeps the land in agriculture and realizes multiple layers of land use through agrivoltaics. Our scientists



and ecologists are advising us that in most cases, the solar land use is much less intensive than traditional agricultural uses, and over the life of the solar project, the soil health underneath the arrays will be significantly improved.

In closing, the types of projects that would be enabled by the changes we propose to the RES are much more than energy projects - they have the potential to be a transformative force for individual landowners and farmers, for towns, for our working landscape, and for Vermont's economy.