

From: [Ben Gordesky](#)
To: [PSD - RE Programs](#)
Subject: Comments for Comprehensive Review Renewable Energy RFI
Date: Tuesday, July 12, 2022 10:39:53 AM

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Thank you for the opportunity to provide comments and I am glad that the Department is open to re-thinking its approach to renewable energy in Vermont.

At this point, a substantial portion of Vermont's electricity comes from Hydro Quebec (HQ). The RFI expresses interest in engaging front line communities impacted by energy production. The Cree and Inuit nations are the front line communities of Hydro Quebec. They need to be at the table for these discussions. The Department should intentionally invite them to be part of the conversation. If you need any help knowing who to contact, I will do my best to find that for you.

In addition, the Vermont RES needs to be re-written to not include HQ as renewable power. The methane emissions from the flooding and draining of the vast areas used for water storage in Quebec are substantial. The climate impact of HQ power is estimated at 40% of natural gas generation. This does NOT include the impacts of the initial construction. Compare this to solar or wind energy that have a climate impact at 4% - 8% of natural gas. These numbers DO include the impacts of initial construction.

Also, at this point, the hydro power we buy from HQ is from already constructed generating stations. So, even if we consider HQ clean and renewable, our purchase of HQ power and RECs does nothing to increase renewable energy in the world or lessen the climate impact of our energy usage. But, if HQ does start building new dams to meet increased demand it will become even worse. It would then be impossible to ignore the climate impact of construction for the new projects. In this case, HQ power would have a climate impact no better than natural gas.

If the reliance on HQ to meet RES goals cannot be turned to zero in one year, I would recommend a step down over a time period no greater than five years.

Thank you for your consideration of my comments.

Sincerely,

Ben Gordesky
Renewable Energy Manager
DC Energy Innovations, Inc.
#dcenergy #solarpanels #localsolar
(802)363-1474
bgordesky@dceivt.com

5072 US Route 2
North Hero, VT 05474

OR
12 North Street
Burlington, VT 05401