8/15/2022
Comments on Comprehensive Review of Vermont's Renewable & Clean Electricity Policy and Programs

Topic 1: Timeline for Policy Review and Stakeholder Engagement
a. What aspects of the proposed timelines should the Department prioritize?

b. Which timeline provides adequate time and space for engagement and technical analyses?
It isn't necessary to choose only one timeline. There are two opposing factors: 1) utility issues are complicated and it takes time to gather informed, broad input and 2) the urgency of action makes it crucial to have recommendations for the 2023 legislative session. The answer is to pursue 2022 engagement to highlight some easily-identified priorities by January 2023 for the legislature, and continue further engagement during 2023, for additional recommendations for 2024 legislative action

c. Attachment A identifies key stakeholders with whom the Department should engage.
i. What other stakeholders should be considered?
Since Vermont utilities rely so heavily on HydroQuebec for RECs, reach out to the indigenous communities impacted by HQ system of dams.
ii. Are there specific organizations with whom the Department should engage? If so, who?
Because volunteers active with town energy committees know and understand local issues and obstacles, work with VECAN and RPC energy staff to get input from them, regionally.

d. Attachment A identifies several different forms of engagement, including stakeholder forums, Department staff at community events, interactive workshops, polling, and written comments.
i. What format(s) of engagement would you prefer and why?
This range of formats will involve different people, with different levels of expertise, so use them all.
ii. Should the Department consider other forms of engagement beyond those listed? If so, please explain.
Deliberative polling: https://www.aascu.org/programs/adp/dpolling/

Topic 2: Decision Criteria
[2022 CEP criteria include equity, cost-effectiveness, carbon reduction, grid impact, economic development, uncertainty, and simplicity.
30 V.S.A. §202a calls for Vermont to meet its energy needs adequately, securely, sustainably, and cost-effectively while encouraging the economic vitality of the state and meeting greenhouse gas requirements.]

a. Are there any additional criteria that should be applied to the evaluation of Vermont's renewable and clean electricity policies and programs?
In-state generation should be a clearly defined goal, because it inherently increases resilience and keeps investment in Vermont.
Encouraging net-metering should be a goal, because it enables organizations and individuals to directly participate in the transition to renewables.

b. How should the Department prioritize these criteria?
Cutting GHG emissions should be given top priority, in the context of unanimous and urgent recommendations by international agencies to cut emissions by 50% by 2030.

Topic 3: Key Issues for Consideration

a. What is Vermont doing well when it comes to the deployment of and access to renewable and clean electricity to meet growing demand?

b. What are key challenges / gaps in existing programs and policies that should be considered in this process?

- How we account for HydroQuebec RECs is problematic. Not only do our utilities account for RECs associated with power supply purchases from HQ, they also purchase unbundled RECs to satisfy RES Tier II requirements. They sell Class I RECS down-country at a premium and buy HQ RECs (which no other state even recognizes as renewable) to satisfy their regulatory obligations.
- Accounting for the societal benefits associated with in-state renewables, ie. jobs, resiliency, additionality, etc.
- Accounting for the negative impacts of energy purchases, i.e. impacts of HydroQuebec on indigenous communities, of nuclear waste, GHGs, etc.
- In permitting, the PUC should prioritize Community Solar projects with off-takers that include low and moderate income households, municipalities, and school districts. For households, these projects decrease the energy burden; for public entities, they save operating costs and therefore benefit taxpayers.
- DPS should calculate the benefits to the grid of in-state renewable energy in the same way that the benefits of efficiency are calculated.
- DPS should calculate the benefits to the state economy of in-state renewable energy.
- Tier 2 resources – local, additional, low-carbon – should be increased.
- Utilities should not be permitted to sell Tier 2 RECs.
- Stop VT retail utilities from purchasing carbon offsets from nuclear plants to obscure ISO-NE fuel purchases.
- Phase out the eligibility of RECs from HydroQuebec to meet Tier 1 requirements.
- Require all new energy purchases by utilities to adhere to “additionality” (as defined in the GWSA).

Additional Comments / Issues for Consideration

Are there other programs related to Vermont’s strategies for clean and renewable energy electricity that should be addressed in this review? For example, should the Department consider updates to Tier 3 of the Renewable Energy Standard in this process?

- Tier 3 should be expanded, to aggressively reduce emissions from the thermal and transportation sectors. The DSP must develop a thermal performance standard in more detail and examine the costs and benefits of the proposal advanced by the Climate Council and the General Assembly. The review should consider the costs, savings, and climate, environmental and health benefits of the principal design options and the costs and benefits of different heating choices. It should specifically consider program options that would minimize impacts to low-income Vermonters.
- Permits for renewable energy projects can be conditioned on, but not denied, for visual impact; To quote Bill McKibben: “Building clean energy is *the* project of our era on earth. And at some level it really *is* an aesthetic issue. When we look at a solar panel or a wind turbine, we need to be able to see—and our leaders need to help us see, because that’s what leadership involves—

that there’s something beautiful reflected back out of that silicon: people finally taking responsibility for the impact our lives have on the world and the people around us. We are in an emergency, and an emergency calls for imagination, for literally seeing things in a new way.”

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