

## MEMORANDUM

TO: Vermont Department of Public Service  
FROM: Chittenden County Regional Planning Commission Staff  
DATE: 12/20/2022  
RE: Draft 2022 Comprehensive Energy Plan

Thank you for the opportunity to comment on the draft 2022 Comprehensive Energy Plan (CEP). We appreciate the effort that went into this plan and are pleased to offer the following staff-level comments numbered and in italics.

### Transportation Demand Management and Land Use:

CCRPC understands that we are far from success on reducing Vehicle Miles Travelled:

2016 CEP Goal	Goal Number	Current Status per the 2021 Annual Energy Report <sup>35</sup>
Triple the number of state park-and-ride spaces	3,426	1,525
Increase public transit ridership by 110%	8.7 million annual trips	4.71 million annual trips
Quadruple VT based passenger rail trips	400,000 annual trips	149,795 annual trips
Double the rail freight tonnage in VT	13.2 million tons	6.7 million tons
Increase the percentage of EVs	10% of vehicle fleet	0.6%
Increase the number of HD and MD vehicles powered by renewable energy	10% of vehicles	4-10 transit and school buses; biodiesel ~0.02% of total fuel portfolio

And yet, the Plan states “Recommendation: Provide Safe, Reliable, and Equitable Public and Active Transportation Options. Vermont already invests substantially in TDM options and should continue to do so.” Simply continuing to support these programs and efforts at the same level is not going to move the measures in the table above.

Given this CCRPC Staff have the following comments:

1. *The Transportation Demand Management recommendation is not sufficient. Significantly more investment is needed to support TDM programs. Consider doubling the current investment.*
2. *Regarding the increase in Electric Vehicle ownership - when a company can advertise an electric vehicle with the slogan “drive more for less”, we could be going down a route where we use less fossil fuels yet*

*increase vehicle miles travelled. Car-centric lifestyles need mitigation through better land-use and alternative mobility solutions.*

- 3. In addition, the Plan should also recommend state prioritization of investment in water wastewater infrastructure for walkable communities, and transportation infrastructure within, and adjacent to, our state-designated centers to foster our desired land development patterns of compact settlements surrounded by rural countryside. This land use pattern is critical to getting people to drive less.*

#### **Fast Charger Installation:**

The CEP states “5.4.3 Strategy Managing Electric Grid Impacts of PEVs, 5.4.3.1 Rate Design: Encourage regional and municipal plans to identify preferred locations for public-serving DC fast chargers, such as downtowns and village centers. The Legislature has established a goal to locate DC fast charging within five miles of every interstate exit and within 50 miles of another fast charger on state highway network.”

- 4. CCRPC Staff recommends prioritizing chargers at Multi-Family Units as charging at home overnight is an effective method for charging and currently this is largely out of reach for multi-family/apartment residents.*

#### **Building Energy Standards:**

The CEP states “6.3.2.1 Building Energy Standards: Municipalities should consider hiring a code official to review construction documents, receive RBES and CBES certificates, and enforce the building energy standards. If there isn’t enough construction to justify a municipal code official, perhaps a regional official could be paid by multiple municipalities.”

- 5. CCRPC Staff finds this draft action does not adequately address energy standards enforcement/compliance issues. It conflicts with state statute that gives builders the option to self-certify, and does not give municipalities the authority to enforce; nor would it make sense for the municipalities to enforce a code adopted by the state. It is a state energy code that requires enforcement at the state level, just like the rental/health safety code. The state can fund this effort via permit fees. The state should also create a builder licensing program or some other method to increase enforcement.*
- 6. CCRPC Staff also suggest consideration of a certain amount of weatherization should be required with any construction permit. Any substantial improvement should trigger a weatherization requirement.*

#### **Weatherization:**

The CEP states “6.3.1 Weatherization at Scale: Support for On-bill Repayment. As described above, Vermonters may have barriers to weatherization including split incentives or inability to secure or aversion to financing.” Described further in Section 6.3.1.5, a “to-the-meter” financing mechanism is expected to be filed by distribution utilities, in partnership with Vermont Housing Finance Agency, in 2022. The pilot is intended to, if successful and fully funded, become self-supporting - meaning eventually funding from private sources of capital could be used to fund weatherization.

- 7. CCRPC Staff suggests that this cost should be borne by government, especially for low-income homeowners. For rental properties, it should be borne (at least in part) by the landlord/owner. The [Low Income Weatherization](#) program is there and could definitely use more funding to broaden the range of people it can assist. Tenants should not incur increased costs due to weatherization.*

### **Promote Electrification of Thermal Loads:**

The CEP states “6.4.2.1 Promote Electrification of Thermal Loads: Continue to encourage the installation of heat pumps, particularly in weatherized or already high performing buildings to maximize the efficiency of heat pumps, and in partnership with Weatherization efforts.”

8. *CCRPC Staff suggests funding a large, consistent incentive across distribution utilities for cold climate heat pumps. Currently there are large incentives in some areas and very low incentives in others. This could be written into Tier III standards.*
9. *Also, CCRPC Staff suggests consideration of emissions standards or building performance programs for current buildings. See <https://www.2030districts.org/burlington>*
10. *We greatly appreciate the intention in the CEP to “leave no Vermonter behind,” that all solutions must be filtered through an equity tool, and that all solutions must not affect affordability. We do have a concern that moving to electricity sources for home heating is more expensive in a time when overall housing costs are too high for many. We encourage alignment between the state’s goals of renewable sources for home heating and affordable housing.*

### **Grid Modernization:**

Given the importance of grid modernization to meet the state’s energy goals, and the significant capacity limitations of the transmission system, CCRPC offers the following comments:

11. *Additional transmission infrastructure will be needed, particularly in northern Vermont, to ensure that each geographic region of the State is able to contribute to our future renewable energy goals.*
12. *The CEP should call for proactive strategic investments to address needed substation upgrades.*
13. *The CEP should identify the need to ensure that VELCO has the statutory authority in 30 V.S.A. 218c to effectively plan for necessary grid modernization that will likely be necessary to achieve our State, regional, and local energy goals.*
14. *CCRPC understands that VELCO operates within a federally regulated open wholesale market which prohibits VELCO, and/or the State of Vermont, from levying specific fees for transmission upgrades. This limitation will constrain possible locations for new distributed generation facilities because it creates a system of reacting to grid congestion instead of planning for sufficient transmission capacity. It puts financial burden on the “last facility in,” and/or the ratepayers, in circumstances when transmission upgrades are needed to accommodate additional distributed generation. This is inequitable and will stifle long-term renewable energy goals due to inadequate financial planning for transmission system upgrades.*
15. *It would be preferable and more effective for the CEP to suggest that Regional Planning Commissions talk to VELCO and Distribution Utilities when they develop their Energy Plans to address these issues, rather than on a case-by-case basis during CPG applications.*

### **Effect on Regional and Municipal Enhanced Energy Plans:**

CCRPC understands the draft CEP calls for the following goals/targets. The changes from previous plans are highlighted in yellow:

**Renewable Energy:** This CEP builds on and re-establishes the goals set in 2011 and 2016 CEP’s:

- 25% of energy needs from renewable sources by 2025,
- 45% by 2035,
- 90% by 2050

**Greenhouse Gas Reduction:** The Global Warming Solutions Act requires

- 26% reduction from 2005 levels by 2025
- 40% reduction from 1990 levels by 2030
- 80% reduction from 1990 levels by 2050

Like the 2016 CEP, this draft Plan covers **all energy sectors**, and it sets new goals for each sector:

- **Electric Sector:** meet 100% of energy needs from carbon-free resources by 2032, with at least 75% from renewable energy
- **Transportation Sector:** meet 10% of energy needs from renewable energy by 2025, and 45% by 2040
- **Thermal Sector:** meet 30% of energy needs from renewable energy by 2025, and 70% by 2042

While the draft plan indicates that there is a shift in focus in the short-term from renewables to decarbonization of the electricity sector, there is still a need for renewable energy generation particularly as we shift to using more electricity for transportation and heating/cooling. At the same time there is a proposal to add more land use constraints (priority forest blocks, riparian areas and surface waters) in the regional and local enhanced energy planning standards (aka Act 174 standards).

*Given this CCRPC Staff have the following comments:*

- 16. We appreciate that regional and municipal enhanced energy plans don't need to be brought up to speed with the new CEP until they expire, however, these changes may require significant updates to the enhanced energy plans and we'd be better served by implementing those plans rather than updating them.*
- 17. If significant updates are needed to regional and municipal enhanced energy plans, the Department of Public Service should invest in regional planning commissions to do this intensive work. Additionally, if the list of known and possible constraints are going to change, the Department of Public Service should consider providing RPCs with revised energy resource area GIS data.*
- 18. Regarding the addition of land use constraints to the enhanced energy plan standards, and particularly the priority forest blocks, we agree that these forests are important. However, they should be regulated with consistency at the state level for all types of development (not just renewable energy projects). In addition, regulating resources through municipal and regional plans rather than state regulation is ineffective. Adding these resources to the PUC review criteria directly would be more effective.*