

Hi all,

Thanks to those of you who responded. I heard from several folks that S.5 includes "guardrails" that address my concerns. Please know that my concerns are just mine. Just today for example VT Digger ran this opinion piece:

<https://vtdigger.org/2023/03/21/cheryl-joy-lipton-key-elements-missing-from-vermont-climate-change-plans>

There are two reasons I do not believe S.5 addresses the concerns about the carbon emissions of biomass. The first is the clear language of the bill itself. S.5 doesn't address the energy intensity or carbon emissions factors of wood so the guardrails don't exist for biomass.

The bill is carefully crafted so that the guardrails do not apply to wood. This is why I ask that you include the word "**solid**" be included to *liquid* and *gas* in the following section:

(f) Carbon intensity of fuels.

(1) To be eligible as a clean heat measure a **solid**, liquid or gaseous clean heat measure shall have a carbon intensity value as follows:

Another edit could be removing all conditions to the text reads; ***To be eligible, a clean heat measure shall have a carbon intensity value as follows:***

Without either one of these edits, no, there are no guardrails for biomass. As other measures are phased out over time, biomass, which again is dirtier than natural gas, even dirtier than coal, will remain as a measure and increase in usage, adding CO₂ into the atmosphere rather than reducing CO₂.

The second reason I don't believe my concerns are addressed is represented by the administration's policy regarding 10 V.S.A. § 582(g). We have clear, unequivocal language that biomass should be counted *now* and yet it is ignored. This policy is influencing the work at the Climate Council, which has tacitly adopted this policy. Examples;

For example, Mr. Smyth mentioned a contractor hired to perform a life-cycle analysis. In her RFP, Jane Lazorchak, identified that biomass must be considered on a net carbon basis and included an example table that showed that CO₂ from biomass wouldn't be counted. This was reaffirmed in email between ERG (the contractor) staff and ANR staff. I can send you copies of this email at your request (which I obtained via a public records request).