

Proposed amendments to S.5

Richard Cowart, February 9, 2023

Clarifying that clean heat credits are earned from the delivery of eligible clean heat measures to or in new construction.

8125(b) on p16 of S.5 proposed strike-all Draft No. 1.1

(b) Credit values. Clean heat credits shall be based on the accurate and verifiable lifecycle CO<sub>2</sub>e emission reductions in Vermont's thermal sector that result from the delivery of eligible clean heat measures to existing or new end-use customer locations into or in Vermont.

Clarifying in the description of the schedule of lifecycle emission rates that clean heat measures can be both fuels and installed measures that use fuels. The current language implies that fuels can be used in clean heat measures, but cannot themselves be clean heat measures, which is inconsistent with other provisions in S.5 including 8125(c), the list of eligible clean heat measures.

8125(f) on p19 of S.5 proposed strike-all Draft No. 1.1

(f) Emissions schedule.

(1) To promote certainty for obligated parties and clean heat providers, the Commission shall, by rule or order, establish a schedule of lifecycle emission rates for heating fuels and any fuel that is used in a clean heat measure, including electricity, or is itself a clean heat measure, including biofuels. ~~biofuels, electricity, and any other fuel used by a clean heat measure.~~ The schedule shall be based on transparent, verifiable, and accurate emissions accounting adapting the Argonne National Laboratory GREET Model, Intergovernmental Panel on Climate Change (IPCC) modeling, or an alternative of comparable analytical rigor to fit the Vermont thermal sector context, and the requirements of 10 V.S.A. § 578(a)(2) and (3).

Note that red underlined or ~~struckthrough~~ text is proposed here, highlighted text is new text already included in Draft 1.1.