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February 5, 2026

Dear Representative Sibilía,

I'm writing on behalf of the U.S. Green Building Council (USGBC) to commend you on H. 727, as it's critical for regulatory bodies to be given the tools necessary to address new and challenging situations posed by technology on the environment and ratepayers. USGBC supports H. 727 if amended, with suggested amendments described below.

USGBC is a 501(c)3 member organization supporting the development of prosperous, healthy, and resilient communities through the built environment. Through its Leadership in Energy and Environmental Design (LEED) green building program, USGBC is committed to transforming how our buildings and communities are designed, constructed and operated, enabling an environmentally and socially responsible, healthy, and prosperous environment for all.

As stated, it is important to equip regulators with a framework that adequately allows them to address the issues at hand, such as the impacts of data centers. While this bill requires the Public Utility Commission to consider enhanced energy efficiency standards or any other standard deemed appropriate, USGBC recommends requiring data centers to achieve a third-party certification that holistically approaches a building's impact on the community – including energy and water efficiency – and provides a minimum foundation across critical categories through prerequisites. This requirement not only compliments other sustainability considerations within the bill, but it also provides certainty that data centers built in Vermont are meeting comprehensive and rigorous green building benchmarks.

Several states are legislating frameworks for data centers—among them being Wisconsin, which does incorporate a green building certification requirement into a proposed framework under A.B. 722/S.B. 729, and requires the owners or operators of data centers to demonstrate to the state that the certification was completed. Accepted certifications under the bill would include LEED for Building Design and Construction (BD+C) or LEED for Operations and Maintenance (O+M).

USGBC was the first green building certification system to address data centers and offers LEED BD+C and LEED O+M certification specialized for

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data centers. As such, there are already 1,645 LEED certified data centers (over 490 million square feet) across the globe as of September 2025. (More information about applying LEED to data centers can be found [here](#).)

Thank you for your time and for considering USGBC's suggestions regarding H 727. Please feel free to contact me with any questions.

Best,

/s/

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