

MEMORANDUM

To: Representative Kathleen James, Chair of the House Committee on Energy and Digital Infrastructure
From: Ann Janda, Chittenden County Regional Planning Commission Senior Energy Project Manager
Date: February 4, 2026
Re: CCRPC Staff Recommendations for Proposed Legislation H-740 Regarding a Greenhouse Gas Reporting Framework

CCRPC staff have extensive experience with regional and municipal enhanced energy planning, climate action planning, and developing greenhouse gas emissions inventories. A statewide GHG reporting program could fill in some existing gaps, and in this memo, we offer some recommendations based on our long, applied experience in utilizing data to support the best planning possible.

As stated in the [December 22, 2025 memo](#) from Agency of Natural Resources Secretary Moore:

The 2025 Vermont Climate Action Plan (CAP) includes the following request to the Agency of Natural Resources (ANR): Develop a framework for the reporting of greenhouse gas emissions data from fuel suppliers and other significant emitters of climate pollution.

In fulfilling this request from the Climate Council, ANR analyzed two reporting frameworks: harmonization and standalone. Harmonization would have ANR staff compiling and reconciling various types of data collected by other departments, notably fuel sales data collected by the Departments of Tax and Motor Vehicles. The adoption of a standalone reporting rule, on the other hand, would have covered entities reporting GHG emissions data directly to ANR. We have considered both options and believe, should the Legislature choose to proceed with a GHG reporting program, that a standalone reporting rule is most appropriate for Vermont.

A standalone reporting rule would allow ANR to define, collect, and analyze sufficient data to develop a robust estimate of statewide GHG emissions from covered sectors. It would also give ANR the ability to expand the scope of the reporting program to additional sectors and covered entities if deemed appropriate for future mitigation activities.

As you consider this important bill, we respectfully offer the following recommendations as the legislation is further developed:

Per Act 174, Regional Planning Commissions must develop [enhanced energy plans](#) that comply with

the standards set by the Vermont Public Service Department. For a decade now, RPCs have been working closely with communities in their regions to inform the required regional enhanced energy plan – which obligates each region to outline their strategies for helping the state meet its clean energy and climate commitments. This work is premised on accessing the best data. But the data available to regions to support this process is significantly lacking, particularly when it comes to addressing the thermal sectors – something municipalities often ask for. Which is clearly something a statewide GHG reporting program could help fill in.

One element of this planning involves estimating fuel consumption for RPC regions and the municipalities within those regions. Currently, accurate, delivered fuel consumption data is unavailable, except from Vermont Gas Systems (VGS). To fill the gap, RPCs use estimates from the American Community Survey data, which has a wide margin for error (see example from Underhill’s Energy Data Guide).

Table A2. Home Heating by Fuel Type, 2022

Heat Source	# of Homes	Margin of Error	% of Homes	% Margin of Error
1 Utility gas	115	+/- 69	9%	+/- 5.5%
2 Fuel oil, Kerosene	529	+/- 163	43%	+/- 12.4%
3 Propane	146	+/- 65	12%	+/- 5.1%
4 <i>Subtotal Oil, Kerosene, Propane</i>	675	+/- 176	55%	+/- 12.9%
5 Wood	359	+/- 107	29%	+/- 8.1%
6 Electricity	7	+/- 10	1%	+/- 0.8%
7 Non-PV solar energy	0	+/- 10	0%	+/- 0.8%

Sources: American Community Survey 2022 5-Year Estimate, Table B25040. Data are associated with a margin of error.

As you can imagine, estimates are not as useful to support the best planning. Actual data would make a significant difference in crafting the best regional plans, as well as supporting good municipal planning. That is why we think it is important that the state framework for GHG reporting is developed to provide municipal-level data, not just county-level data, since enhanced energy planning sets targets for advancing the State’s 2050 goals for energy use from heating, transportation, and electricity.

We recommend that H-740 be revised to reflect the current regional planning structure (which is not always by county) and to include municipal data collection.

The information collected shall at a minimum include the types and volume of fuels sold, by sector for the transportation, residential, commercial, and industrial sectors, by ~~county~~ Regional Planning Commission and municipalities.

As stated above, the Regional Planning Commissions have been developing enhanced energy plans to advance the State Comprehensive Energy Plan’s climate and energy goals. It is vital that the new Greenhouse Gas Reporting Framework doesn’t create a parallel or possibly redundant effort that doesn’t connect or align with the energy and climate data collection already in progress throughout the state. To accomplish an orderly alignment, reduce duplication of efforts, and possibly save tax-

payer dollars, we recommend H-740 be revised to include cooperation and consultation with regional enhanced energy planners as the framework is developed and implemented.

The H-0740 legislation language below should be revised accordingly.

In fiscal year 2027, the sum of \$800,000.00 is appropriated from the General Fund to the Secretary of Natural Resources to be used to draft the greenhouse gas emission reporting rules, to develop a greenhouse gas emission source database, and to fund staff time on emission source data collection in cooperation and consultation with the Regional Planning Commissions.

Also, based on CCRPC staff experience in preparing the City of South Burlington's GHG Inventory and Climate Action Plan, we would like to note the following.

- CCRPC has an [ICLEI membership](#). This allows CCRPC to use ICLEI's GHG accounting system (ClearPath2.0) that adheres to global GHG accounting protocols. ICLEI coordinates with the US Climate Alliance. Vermont is a US Climate Alliance member.
- For transportation data tracking by municipality, the state should consider expanding the [CCRPC Transportation Sustainability Tracking Tool](#) from just Chittenden County to cover the whole state. The tool was created by the [UVM Transportation Research Center \(TRC\)](#). The Transportation Sustainability Tracking Tool provides key metrics for evaluating the sustainability of household travel across Chittenden County and tracking trends over time. The tool allows users to evaluate changes in greenhouse gas emissions, transportation energy use and travel demand (the amount of driving) at the vehicle, household, and person level at many different geographic scales. It would be ideal to build on this work rather than create something new.