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VIA ELECTRONIC MAIL

House Energy and Digital Infrastructure Committee
State House
115 State Street
Montpelier, VT 05633

RE: House Bill 740

Suburban Propane has been serving customers for nearly 100 years and is the nation's third-largest propane retailer with operations in 42 states. In Vermont, we currently have 99 employees serving more than 34,000 residential, commercial, industrial, agricultural, and governmental customers.

We write today regarding the House Bill 740, which proposes establishing a greenhouse gas (GHG) emission reporting program for transportation and heating fuel providers in Vermont requiring county and industry specific sales data.

Suburban Propane shares Vermont's goal of reducing greenhouse gas emissions, however pursuing an entirely new emissions reporting program will create broad new compliance burdens for suppliers, leading to increased costs and higher prices for consumers. Instead, we urge the state to adopt a program that minimizes disruption and duplication of effort by adopting reporting requirements that allow entities to comply by submitting reports already generated for California's *Climate Corporate Data Accountability Act*.

California's *Climate Corporate Data Accountability Act* (SB 253) was enacted in 2023 and establishes a comprehensive nationwide GHG emissions reporting program.¹ The program requires substantial nationwide emissions reporting, including data from Vermont. Every supplier with national operations will already have gathered emissions data for all states they operate in and can generate state-specific reports without creating undue burden.

Should Vermont choose to move forward with a completely new reporting system, entities will be forced to devote an enormous amount of time and money to ensure they are able to comply with the new requirements. The increased costs associated with compliance would ultimately be passed on to the consumer, increasing prices across broad sectors of Vermont's economy.

Instead, we call on the state to abandon efforts to create a new reporting system from scratch and instead adopt an emissions reporting program that explicitly accepts reports containing Vermont specific data that were submitted in California and satisfy the requirements contained in the *Climate Corporate Data Accountability Act*.

¹ CA Legis. Assemb. S-253. Reg. Sess. (2023-2024). 2023. S.B. 253. [Bill Text - SB-253 Climate Corporate Data Accountability Act](#).



Allowing reports submitted in California to be used in Vermont will streamline business operations by avoiding additional compliance obligations while still providing Vermont detailed, state-specific emissions data. Perhaps most critically, this approach will have the least financial impact on Vermont residents, who will benefit from avoiding the passed down costs of a new program. If the state were to choose to move forward with the current proposal, it is very likely reporting entities will need to raise prices to recoup the significant financial costs associated with multiple reporting systems and requirements.

We suggest any emissions reporting program includes language like that contained New Jersey Senate Bill 679, which requires reporting entities to publicly disclose scope 1,2 and 3 emissions. The language explicitly allows for: *“a copy of a report submitted to satisfy the requirements of the California "Climate Corporate Data Accountability Act," California Health and Safety Code s.38532, for the appropriate fiscal year, may be utilized in order to comply with the provisions of this act².”*

By moving forward with an emissions reporting program that adopts these proposed changes, Vermont would eliminate the burdens associated with complying with a new program, without sacrificing the important emissions data the state is hoping to gain access to. In fact, this data is likely to be significantly more comprehensive, given the requirements of the California program.

This is particularly critical for organizations who have already invested a great deal of time and money in complying with the California requirements. Ensuring compliance with that program was extraordinarily costly and time consuming, requiring significant resources to ensure the requirements were being met. In allowing for these reports to be re-used in Vermont, the state can ensure entities are not being strained a second time by forcing through an entirely new reporting regime.

By allowing reporting parties to submit a copy of their California "Climate Corporate Data Accountability Act" emissions report instead of requiring adherence to a new set of reporting requirements, the state will minimize impact on its business community while ensuring consumer prices remain stable. All while still gaining the actionable insights on emissions the current proposal seeks to gain.

We reiterate our support for the overall goal of reducing greenhouse gas emissions and look forward to working together now and in the future. We remain at your disposal should you have any further questions.

Sincerely,

/s/ Rick Chandler

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² [New Jersey Senate Bill 679](#)