

From: Pike Porter <pikeporter@gmail.com>

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Subject: S. 65

To: Ann Cummings <acummings@leg.state.vt.us>, Thomas Chittenden <tchittenden@leg.state.vt.us>, Ruth Hardy <rhardy@leg.state.vt.us>, Martine Gulick <mgulick@leg.state.vt.us>, <rbrock@leg.state.vt.us>, <sbeck@leg.state.vt.us>, <cmattos@leg.state.vt.us>

Senators,

I ask that you not move S. 65 forward as it is currently written.

I am (currently still) a member of the clean heat standard equity advisory group (EAG). I followed the clean heat standard (CHS) closely through our group, through the work at technical advisory group, through the filings at the PUC, and I am well versed in the CHS and the statutes that S.65 will amend. I, however, write in my personal capacity, and not as a representative of the EAG.

The equity advisory group spent over a year studying the CHS, listening to organizations and community members, and considering the financial impacts of the CHS on Vermonters. The CHS had many laudable components, especially the inclusion of robust community engagement, and the consideration of health harms and financial burdens. I believe you have been provided a copy of the EAG's final report, but please reach out if you would like to receive another copy.

The EAG concluded that the CHS was not equitable as conceived and written.

S.65 takes many of the most problematic measures of the CHS and rebundles them into, as Senator Watson advised at the first Natural Resources and Energy Committee meeting, *a hastily conceived bill* without incorporating any of the safeguards found in the CHS.

One glaring omission from current statute and this *efficiency* bill is a baseline minimum efficiency standard. I ask that you make this simple change to the section of the bill that modifies 30 V.S.A. § 209 (d):

Any programs and measures supporting efficient use of biological and fossil-based fuels shall meet the applicable air quality standards of the Agency of Natural Resources **and have a minimum efficiency greater than 85%.**

I can provide details if you wish, but, as the statutes are currently written, some proposed measures using biological fuels would be eligible for these funds even though they have efficiency of less than 30%. These measures would be eligible even though they do not reduce greenhouse gas emissions. The language I propose would help ensure that the purported goals of the bill align with the actual goals of the bill.

In order to provide actual data on the costs to consumers, I've attached a letter from Burlington Electric submitted in the PUC case investigating the \$700,000 deficit in the BED EEF. The letter concludes:

BED acknowledges that the proposed EEC percentage increase is significant, and that the proposed EEC rates will increase the bills of customers who do not participate in its electric efficiency programs. If approved, the new EEC will likely result in a \$3.00 to \$4.50 increase in residential bills per month.

If Vermont asks consumers to spend \$3-4.50 a month on energy efficiency charges, I think the least consumers can ask in return is a transparent *minimum efficiency greater than 85%*.

Thanks for considering this change. Again, feel free to reach out with questions.

Pike Porter