

May 13, 2026

Senate Committee on Natural Resources and Energy
115 State Street
Montpelier, Vermont 05602

Dear Chair Watson and Members of the Senate Committee on Natural Resources and Energy:

The undersigned ten organizations write in strong support of S.202, the plug-in solar bill, as amended and passed by the Vermont House earlier this month — with one critical caveat we urge the Committee to address, described below. We thank the Committee for its work to advance this legislation earlier this session, and ask you to recommend that the full Senate support the House version of it with that one fix, as well as one addition we are hoping the Committee can also support.

This bill contains important provisions that will save Vermonters money, protect Vermont consumers from overreach by the Trump Administration, and reduce carbon pollution. But to fully realize the environmental and economic benefits of this legislation and ensure it serves all Vermonters equitably, we respectfully urge the Committee to make two targeted amendments: removing the landlord veto for plug-in solar and explicitly adding Expanded Scope Electric Motors to the federal appliance standard backstop.

S.202 remains important legislation for energy equity.

As you know, for too long the benefits of clean energy have largely been out of reach for Vermont renters, condo owners, and others who cannot install a traditional home solar system. Plug-in photovoltaic devices — small, certified solar panels that connect to a standard exterior outlet and feed clean power directly into a home's wiring — offer a practical path to change that, if Vermont sets up a regulatory environment that enables their adoption, as S.202 aims to do.

We urge the Committee to remove the landlord veto provision.

Plug-in solar devices represent a technology that can help democratize the benefits of clean energy - and as this Committee knows well from its work on the bill, those benefits are most acutely needed by renters in particular. Unfortunately, 30 V.S.A. § 256(g) in Sec. 2 of the House-passed bill — which allows a landlord to deny a tenant the right to use plug-in solar for any reason — effectively hands landlords a blanket veto over tenants' ability to access clean energy. This undercuts the core purpose of the bill, and calls into question whether it will ever effectively achieve its goals.

The core concerns expressed in the House Committee that led to this provision focused on the possibility that electrical work to support the installation of a plug-in solar device could be done

without a landlord's permission, or that a landlord could potentially be required to rewire a unit they owned, or pay for rewiring done in a unit they owned.

Those scenarios seem to us implausible at best under current Vermont law, and to address them this provision could clarify that such electrical work to support a plug-in solar device cannot be done without a landlord's permission, or be required to be done by a landlord or at a landlord's expense.

We strongly urge the Committee to remove this provision or replace it with a much more narrowly tailored provision that does not allow for a landlord veto in other circumstances. **If this provision remains in the bill, the core purpose of the version of S.202 the Senate supported unanimously would be dramatically undermined.**

The House amendment updating Vermont's appliance efficiency backstop is an important and timely addition.

Vermont law currently directs the Commissioner of Public Service to adopt minimum appliance efficiency standards tied to federal rules as they existed on January 19, 2017 - at the end of the Obama Administration. This provision was passed by the legislature in 2017 out of a concern that the Trump Administration may attempt to roll back these standards, and was signed by Governor Scott on May 22, 2017.

The House amendment updates that reference date to January 19, 2025 — capturing eight years of efficiency improvements to federal standards that Vermont consumers would otherwise lose protection for if those standards are weakened or rolled back at the federal level.

That is not a hypothetical concern. The Trump Administration is actively pushing to weaken or freeze appliance and equipment efficiency standards. Vermont updating its backstop date means that if Washington walks back efficiency protections for refrigerators, water heaters, HVAC equipment, or other common products, Vermont consumers will continue to benefit from the energy savings and reduced energy bills those standards provide. The efficiency standards covered by the updated backstop save Vermont households real money on their energy bills — and locking in that floor is common-sense consumer protection.

We urge the Committee to add Expanded Scope Electric Motors to the backstop.

The House amendment does not include one significant efficiency standard finalized just before the cutoff date: the U.S. Department of Energy's final rule on Expanded Scope Electric Motors, signed on January 8, 2025. This standard is the lone standard in something of a "limbo" at the federal level, as it was finalized but subsequently the Trump Administration refused to actually publish it in the Register, meaning it is not "caught" by the date change in this provision alone.

This rule extends federal efficiency standards to a broader category of industrial electric motors not previously covered. It represents a meaningful efficiency gain — and one that is squarely at risk of federal rollback.

We urge the Committee to include this rule in Vermont's backstop by amending Sec. 5 of the bill to read:

"(6) In the rules, the Commissioner shall adopt minimum efficiency and water conservation standards for each product that is subject to a standard under 10 C.F.R. §§ 430 and 431 as those provisions existed on January 19, 2017-2025 and amended in a final rule entitled 'Energy Conservation Program: Energy Conservation Standards for Expanded Scope Electric Motors' signed on January 8, 2025, excluding any motor incorporated into a product to which a federal energy conservation standard applies under 10 C.F.R. Parts 430 or 431. The minimum standard and the testing protocol for each product shall be the same as adopted in those sections of the Code of Federal Regulations, except that for faucets, showerheads, and urinals, the minimum standard and testing protocol shall be as otherwise set forth in this section."

Conclusion

S.202 is a straightforward, practical step toward a cleaner and more equitable energy future in Vermont. With the two amendments described above, it will be a stronger bill. We respectfully urge the Committee's support for those changes, and with them, support for returning the bill to the House with further proposal of amendment.

Respectfully submitted,

350Vermont
Conservation Law Foundation
Renewable Energy Vermont
Third Act Vermont
Vermont Businesses for Social Responsibility
Vermont Chapter of the Sierra Club
Vermont Community Thermal Networks
Vermont Conservation Voters
Vermont Interfaith Power & Light
Vermont Natural Resources Council
Vermont Public Interest Research Group