



Bennington County Regional Commission

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To: June Tierney, Commissioner
Vermont Department of Public Service

From: James Sullivan, Director
Bennington County Regional Commission

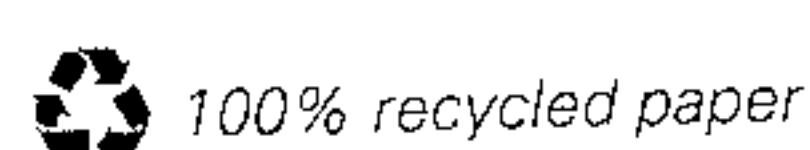
Date: April 21, 2017

Subj: Submission of Regional Plan for Determination of Energy Compliance /
Consistency of Bennington County Regional Plan and Bennington County Regional Energy Plan

Please accept the attached comprehensive Bennington County Regional Plan, together with the recently adopted (as an amendment to the comprehensive Regional Plan) Bennington County Regional Energy Plan, as the request by the Bennington County Regional Commission (BCRC) for a Determination of Energy Compliance pursuant to Act 174.

The BCRC has worked closely with the Department of Public Service to develop the new Energy Plan – consistent with the requirements of our contract with the Department (Contract #28403) and with the Energy Planning Standards for Regional Plans. The BCRC submitted a Draft Energy Plan to the Department and received numerous comments and suggestions that were incorporated into this final version of the Energy Plan. Additional comments from the Agency of Commerce and Community Development also were incorporated into the final plan, along with comments received during public meetings and public hearings held by the BCRC this past winter and spring. The Bennington County Regional Energy Plan contains all of the required elements and includes all of the required data, projections, generation targets, and maps that were prescribed by the Department during the planning process. We look forward to your comments and an affirmative Determination that will facilitate our ongoing support of municipal energy planning efforts.

As noted above, the Energy Plan was adopted by the BCRC (March 23, 2017) as an amendment to the comprehensive Bennington County Regional Plan (adopted March 19, 2015). The comprehensive Regional Plan includes all of the elements required pursuant to 24 VSA Section 4348(a), including an energy element. The Regional Plan specifically recognizes and incorporates by reference the Regional Energy Plan (Regional Plan Section 12.1). The Regional Plan's original energy element has been retained, as it provides useful information and policy guidelines for energy planning in the region, but the information in the new Energy Plan (i.e., the amendment to the Regional Plan) includes greater detail, specific data and projections, maps, and an expanded menu of pathways for realizing the region's energy goals – goals which are consistent between both documents. This approach, of a somewhat



more general element in the Regional Plan supported by a detailed subject plan incorporated by reference into the Regional Plan, is not unique to the energy element/plan. The same approach has been taken, for example with the Bennington Region's Landscape-Based Forest Stewardship Plan (Regional Plan Section 8.5) and the Bennington County Regional Transportation Plan (Regional Plan Section 10.1). In all cases, the plans' goals, policies, and recommended implementation actions are consistent and guided by conformance with the state's planning goals set forth in 24 VSA Section 4302.

The comprehensive Bennington County Regional Plan recognizes the significance of energy throughout all of its elements, and especially in the sections of the Plan dealing with Housing (Chapter 4), Land Use (Chapter 7), Natural Resources (Chapter 8), Transportation (Chapter 10), and Utilities, Facilities and Services (Chapter 11) – in addition to Chapter 12 (Energy), of course. The Energy Plan draws policy direction from those complementary sections of the Regional Plan, and is strengthened by their in-depth treatment of topics such as compact mixed use development, alternative transportation modes and fuels, housing programs, and targeted investments in public infrastructure.

There is no divergence in policy between the full Regional Plan and the Energy Plan. Where the Energy Plan provides a more detailed analysis and discussion of certain topics, its language can be relied upon to clarify policies and statements contained in the other sections of the Regional Plan.

Thank you for your time and attention to this request for a Determination of Energy Compliance. We are available to provide any information or coordination needed during the department's review process.