

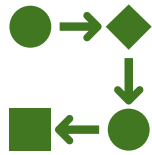
Electricity Policies and Programs Review: Initial Results and Key Takeaways from the Request for Input

PUBLIC SERVICE DEPARTMENT

OCTOBER 14, 2022

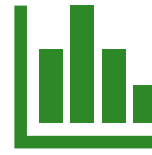


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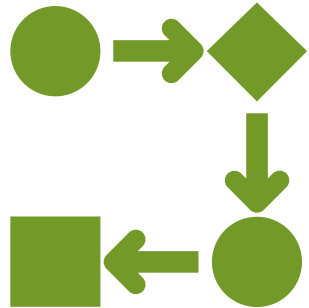
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Next Steps

Where do we go from here?



Context & Process

WHAT DID WE DO & WHO DID WE HEAR FROM

Context

Vermont currently has several programs and policies that have helped to increase the amount of renewable electricity in the state. These include:

- The **Renewable Energy Standard (RES)**, which requires electric utilities to buy a specific amount of electricity from renewable energy resources
- The **Standard Offer** program, which helps deploy small-scale renewable energy projects and
- The **Net-Metering** program, which allows Vermont homes, businesses, and communities to generate their own power, such as by putting solar PV on their homes

In order to meet State renewable energy goals and greenhouse gas reduction requirements, the [2022 Comprehensive Energy Plan](#) recommended that the State should:

“Consider adjustments to the Renewable Energy Standard and complementary renewable energy programs comprehensively, through a transparent and open process....The considerations should include:

- *Consideration of a low-carbon or carbon-free standard, in addition to a 100% renewable energy standard;*
- *Consideration of a cohesive set of programs to support the standard “ (pg. 270)*

This recommendation is consistent with recommendations included in the [2021 Climate Action Plan](#).

What did we do?

To begin implementing this recommendation to review Vermont's Renewable Energy Standard and related programs in a transparent process, on July 5, 2022, the Department of Public Service issued a [Request for Input \(RFI\)](#).

This RFI aimed to collect feedback from the public on three core issues related to the review:

- **Issue 1:** How should the process to review these programs and policies occur? In particular:
 - What timeline should be used to engage with the public and conduct necessary technical analyses?
 - What stakeholders should be at the table to shape recommended policy and program recommendations?
 - What types of ways should the Department engage with those stakeholders?
- **Issue 2:** What criteria should the Department use to make decisions and how should those criteria be prioritized?
- **Issue 3:** What key issues should be considered?

What did we do?

Responses to the RFI were **due on August 15, 2022**.

Members of the public could respond via:

- Email and physical mail
- Online webform (opened at the end of July due to feedback received by the Department)

During the comment period, the Department also participated in a webinar hosted by Vermont Energy and Climate Action Network (VECAN). All comments submitted in the chat during this webinar were also included as input to the RFI.

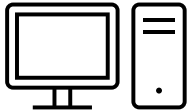
Since August 15, the Department has been reviewing the feedback received and using it to inform the development of a public engagement plan to guide the review of the Renewable Energy Standard and related programs.

This document presents some **initial findings** from that review and highlights **key takeaways** and next steps in this process.

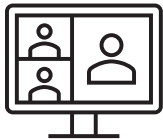
We received:



87* responses submitted via **email, physical mail, and/or phone**



21 responses submitted via **webform**



Comments from **19 participants via the chat of the webinar** hosted by VECAN and Department of Public Service staff.

*Of these 87 responses, 31 were form post cards with largely identical messages.

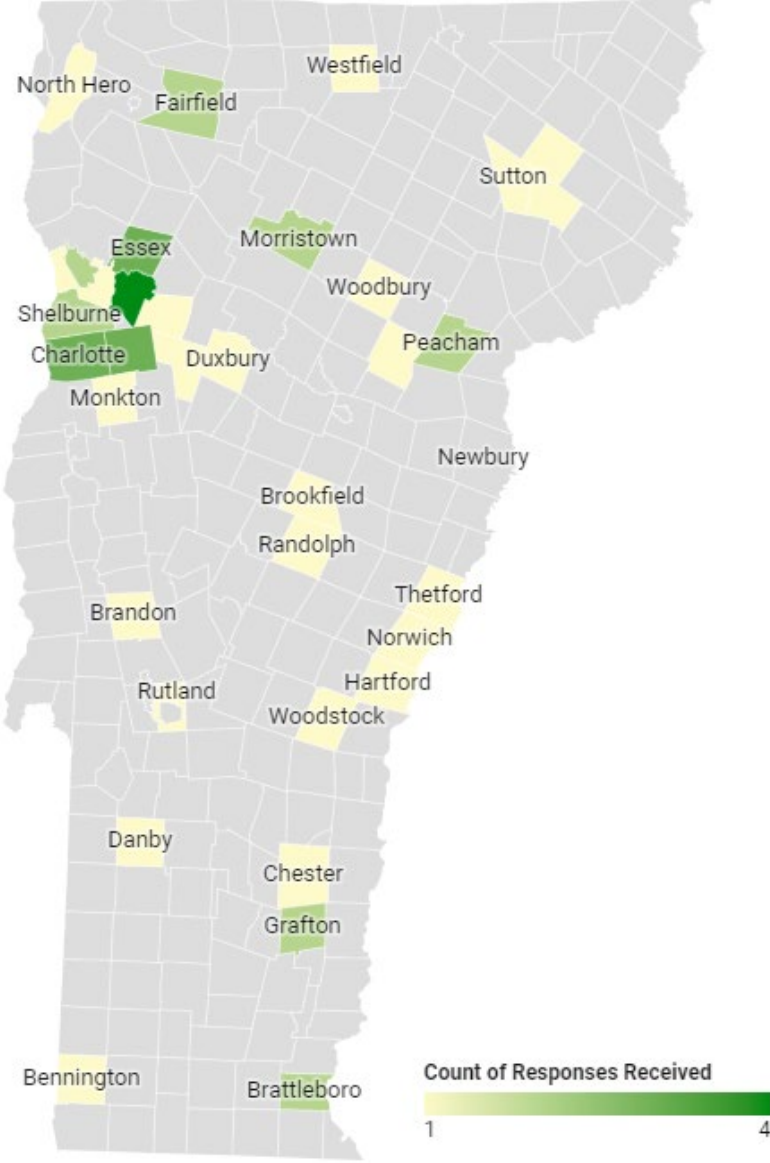
Note: A small number of organizations & individuals responded via multiple channels.

We received responses from:

Individuals and organizations representing **over 36 towns*** across Vermont

7 Regional Planning Commissions and **4 Town Energy Committees**

Organizations representing all **distribution utilities** across the State



***Note:** The Department did not require respondents to submit their geographic location, although did include a voluntary question on this in the webform. This data only represents those individuals who voluntarily disclosed this information.

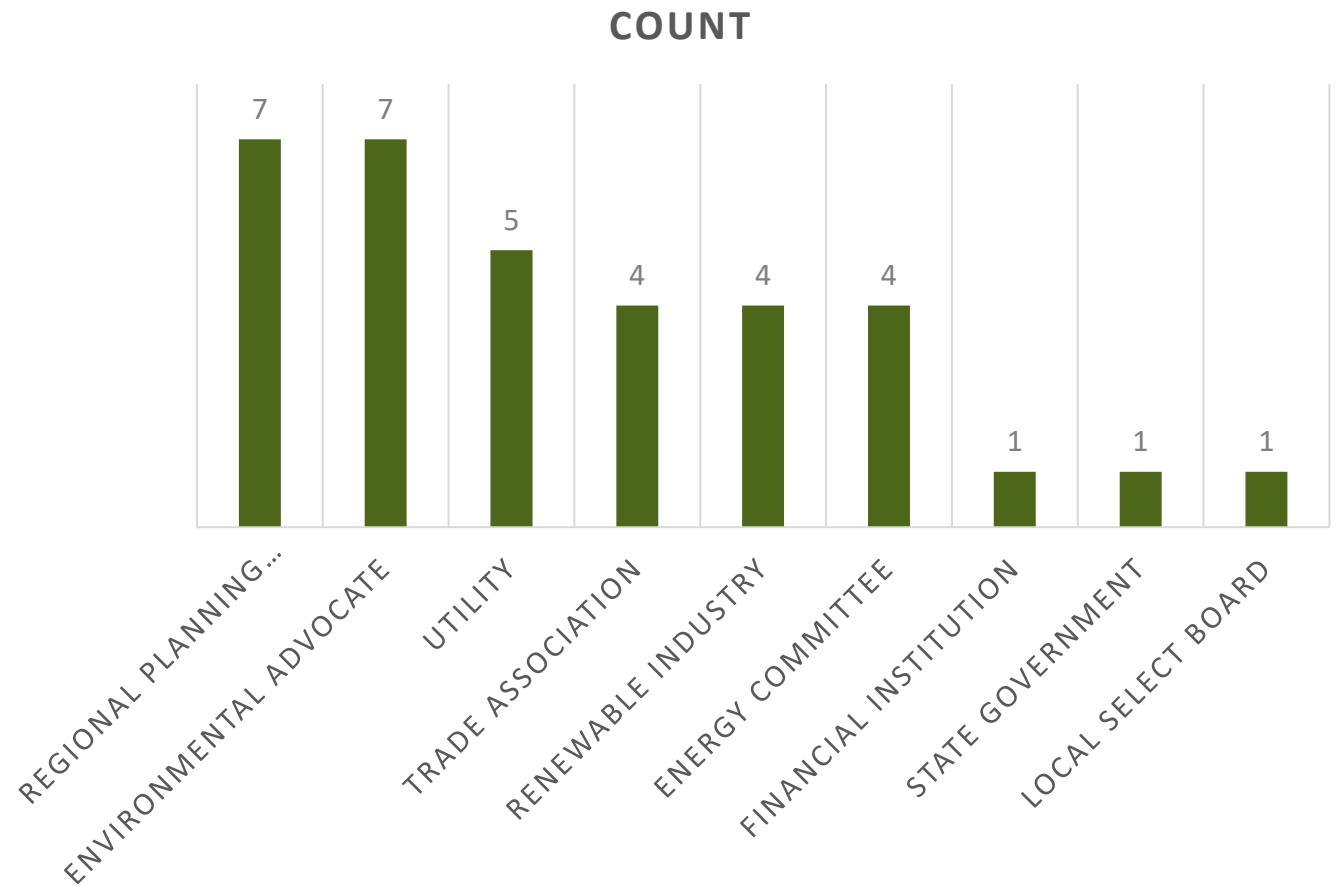
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We received responses from:

74 individuals who did not specifically identify with an organization

34 identified organizations representing:

- Environmental advocates
- Financial institutions
- Trade associations
- State agencies
- Renewable energy developers
- Utilities
- Regional Planning Commissions



*Note: The Department did not ask respondents to identify themselves within a certain type of organization. Organizations were categorized based on Department staff knowledge.



RESULTS

PROCESS, DECISION CRITERIA, KEY ISSUES

Notes on how responses were reviewed:

Each response received was read by at least one member of the Public Service Department (“Department”) and cataloged in an excel spreadsheet.

Individual responses have been posted to the Department’s website for public review and [can be accessed via this link](#).

Many of the responses specifically answered questions included in the Department’s RFI. Responses that did not but instead offered general comments were reviewed and the content categorized under different questions from the RFI as appropriate.

The Department focused the initial review on the questions relating to how the process for the review of programs and policies should occur (timeline, stakeholders, engagement methods) given the priority status of using those responses to inform the development of a public engagement plan.

Responses to the other questions (i.e., on decision criteria and key issues) were also reviewed, but at a higher level. The information on those questions presented here represents an initial synthesis of the content of those responses. The content of those responses will be used to inform forthcoming technical analyses and public engagement opportunities in this process.

Process for Review

TIMELINE,
STAKEHOLDERS, &
ENGAGEMENT
OPPORTUNITIES

How long should the process take?

The Department's RFI provided two example timelines to illustrate different ways a review of renewable and clean energy programs could happen:

- A 7-month timeline to deliver recommendations in time for the 2023 legislative session
- An 18-month timeline to deliver recommendations for the 2024 legislative session

The RFI asked:

Which timeline provides adequate time and space for engagement and technical analyses?

How long should the process take?

Results: 47* responses commented on which timeline would be preferable for the review:

28 responses spoke in favor of the 18-month timeline

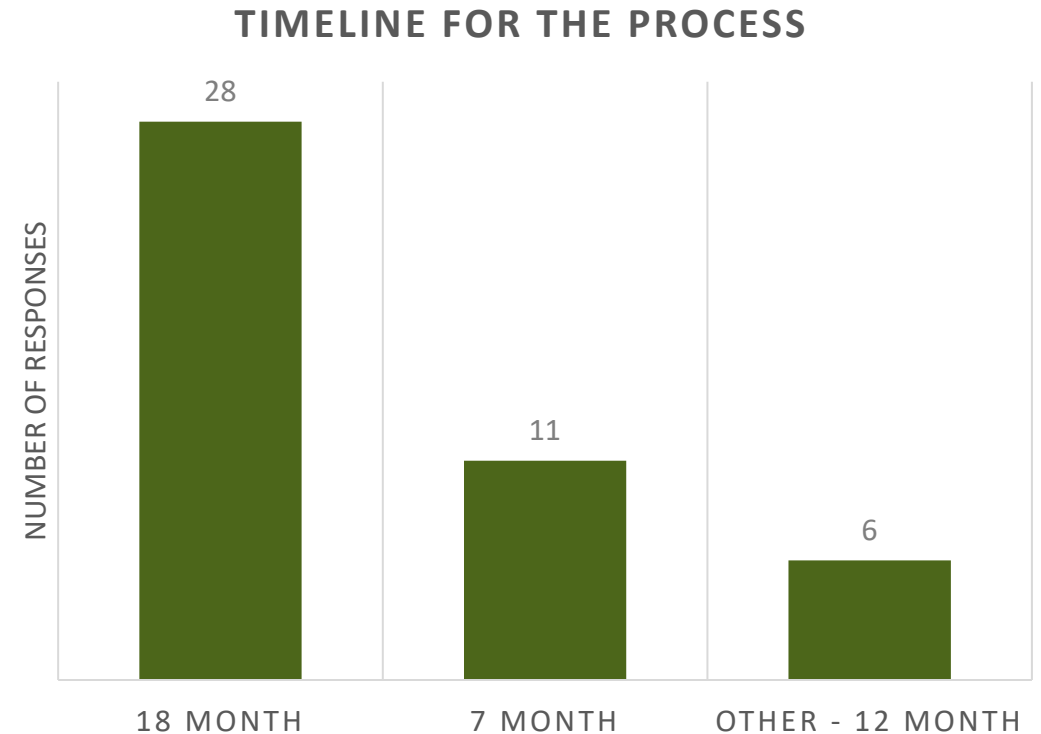
- These responses generally discussed the complexity of the topic to be considered and the benefits of more time to engage with stakeholders

11 responses spoke in favor of the 7-month timeline

- These responses generally discussed the urgency of acting on climate or the urgency to act on specific issues or to identify big picture priorities to address next legislative session

14 responses suggested the Department consider a different timeline.

- **6 of these responses** noted a 12-month timeline should be considered



*Note: Some responses highlighted multiple timeframes as worthy of consideration or that different timelines should be considered for different purposes. That is captured in the data discussed here.

What stakeholders should be involved?

The Department's RFI also identified key stakeholders the Department should engage with during this process, including:

- Vermont utilities
- Renewable energy developers
- Regional planning commissions and municipalities
- Frontline and impacted communities, such as rural, low income, and BIPOC voices
- Community-based and environmental organizations
- State agencies and the Vermont Climate Council
- Academic Institutions

The RFI asked:

What other stakeholders should be considered?

Are there specific organizations with whom the Department should engage?

What stakeholders should be involved?

Responses to the RFI spoke to the need to involve a wide variety of stakeholders in this process, examples of which are represented below:

Educational Institutions	Businesses	Communities / Community-based Organizations	State, Regional, and Municipal Entities	Local Leadership
<p>High school students & their parents</p> <p>School Committees</p> <p>Academic institutions:</p> <ul style="list-style-type: none"> • Four-year colleges • Two-year colleges • Community college • Technical college 	<p>Regional Development Corporations Chambers of commerce</p> <p>Renewable energy developers</p> <p>Utilities</p> <p>Those disproportionately impacted by climate change: Tourism, hospitality, agriculture, recreation</p> <p>Women and BIPOC Communities in Business</p>	<p><u>Communities with specific lived experiences:</u> Low income & high energy burden Rural Gender & Sexual Orientation Black, Indigenous, and People of Color Seniors / Youth Renters / Landlords New Americans Single Parents Indigenous Peoples Impacts by Hydro Quebec Frontline & Impacted Communities, generally Ratepayers / The Public</p> <p><u>Community-based organizations focusing on:</u> Housing & Finance Social welfare (ex. CAP Agencies) Health Workforce development and training Faith / Religion Environmental / Natural Resource Protection</p>	<p>Regional Planning Commissions</p> <p>Regional Housing Partnerships</p> <p>Selectboards & Planning Commissions</p> <p>State Agencies</p>	<p>Legislators</p> <p>Labor Unions</p> <p>Town Energy Committees</p>

*Note: Some organizations or communities could be placed in multiple columns, the categories are not intended to be mutually exclusive. A f

What stakeholders should be involved?

Responses to the RFI provided many suggestions for specific organizations the Department should involve, a list of which is included below:

- AALV
- AFL-CIO
- Age Well
- Agency of Natural Resources, Fish & Wildlife
- Champlain Housing Trust
- Community Action Agencies
- Efficiency Vermont – VEIC
- Evernorth
- IBEW
- Interfaith Power & Light
- ISO New England
- Just Transitions Subcommittee
- Lake and Ponds Association
- Outright Vermont
- Pride Center
- Renewable Energy Vermont
- ReSource
- United Way
- Vermont Area Agencies on Aging
- Vermont Businesses for Social Responsibility
- Vermont Center for Independent Living
- Vermont Energy and Climate Action Network (VECAN)
- Vermont Housing & Conservation Board
- Vermont Housing Finance Agency
- Vermont Landlord Association
- Vermont Legal Aid
- Vermont Low Income Trust for Electricity
- Vermont Professionals of Color Network (VTPOC)
- Vermonters for a Clean Environment
- Waterbury Area Antiracism Coalition
- Wind Action
- Youth Lobby

***Note:** Some organizations or communities could be placed in multiple columns, the categories are not intended to be mutually exclusive. A f

What formats of engagement should be used?

The Department's RFI further identified different ways to engage stakeholders in the process, including:

- Stakeholder forums
- Attendance by Department staff at community events
- Interactive workshops
- Polling
- Written comments
- Public comment forums

The RFI then asked:

What format(s) of engagement would you prefer?

Should the Department consider other forms of engagement beyond those listed?

What formats of engagement should be used?

36* responses commented on the types of engagement opportunities to use during this process:

Many responses highlighted methods identified by the Department (highlighted in **dark green** in the graph)

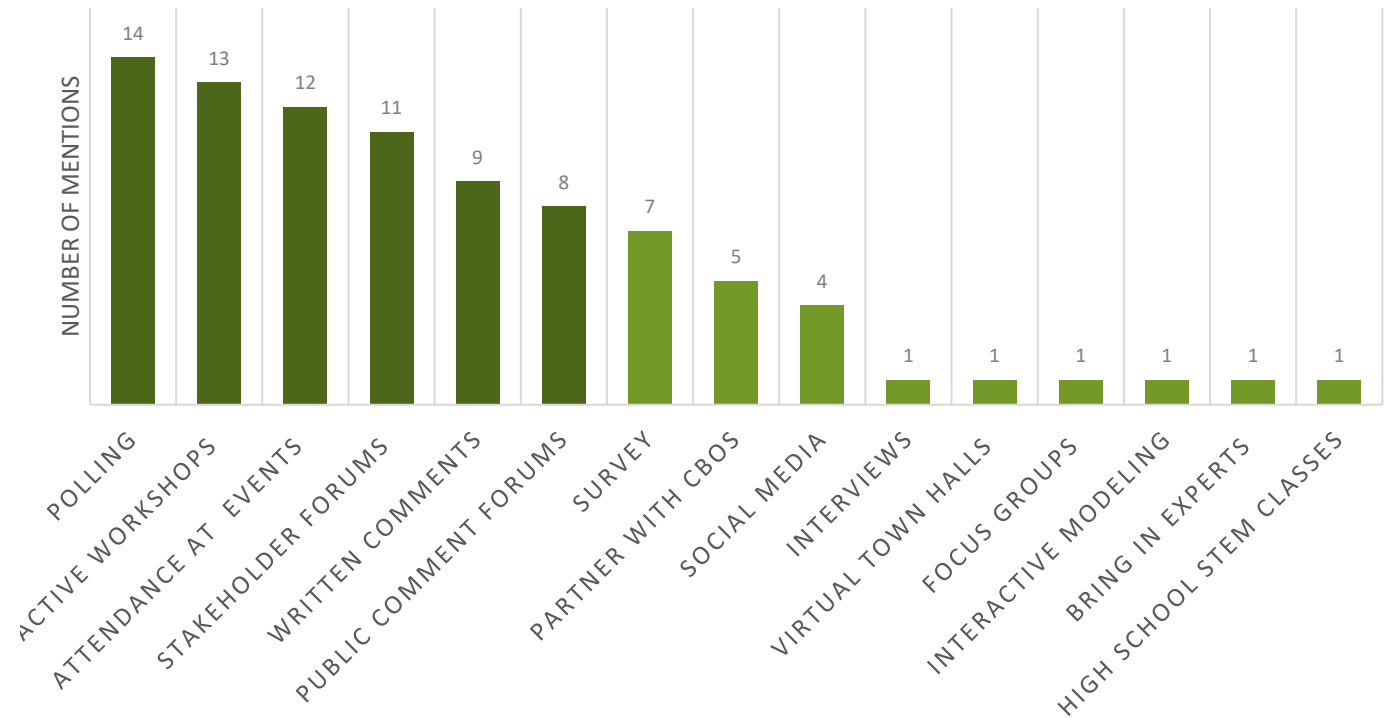
Additional methods suggested included (in **light green**):

- Surveys
- Partnering with community-based organizations (CBOs)
- Utilizing various social media platforms

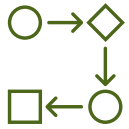
Although the Department did not specifically ask about online or in person events:

- **6 responses** highlighted a preference for **virtual events**
- **3 responses** noted a preference for **in person** events.

TYPES OF ENGAGEMENT METHODS TO USE



*Note: Some responses highlighted multiple types of engagement methods as worthy of consideration. That is captured in the data here.



The weight of the responses lean toward a robust process supported by a longer timeline.



Taking such an approach could offer more time to bring a broader array of stakeholders to the table and allow for educational and capacity building engagement to establish common knowledge about the issues under review. Matters that some stakeholders felt are “urgent” would not move quickly under this approach.



Using a variety of engagement methods at various points in the process could help to better understand stakeholder needs, values, and ideas about policy and program recommendations.

Summary & Key Takeaways

Decision Criteria

CRITERIA TO USE &
PRIORITIZATION

What factors should be considered?

The Department's RFI noted that the 2022 Comprehensive Energy Plan identifies many criteria that should be considered when evaluating ways to expand the use of renewable and clean electricity in Vermont, including:

- Equity
- Cost-effectiveness
- Carbon reductions
- Grid Impacts
- Economic Development
- Uncertainty
- Simplicity

The RFI asked:

*Are there additional criteria the Department should consider?
How should the Department prioritize these criteria?*

What factors should be considered?

95* responses commented on decision criteria the Department should use when weighing policy and program options.

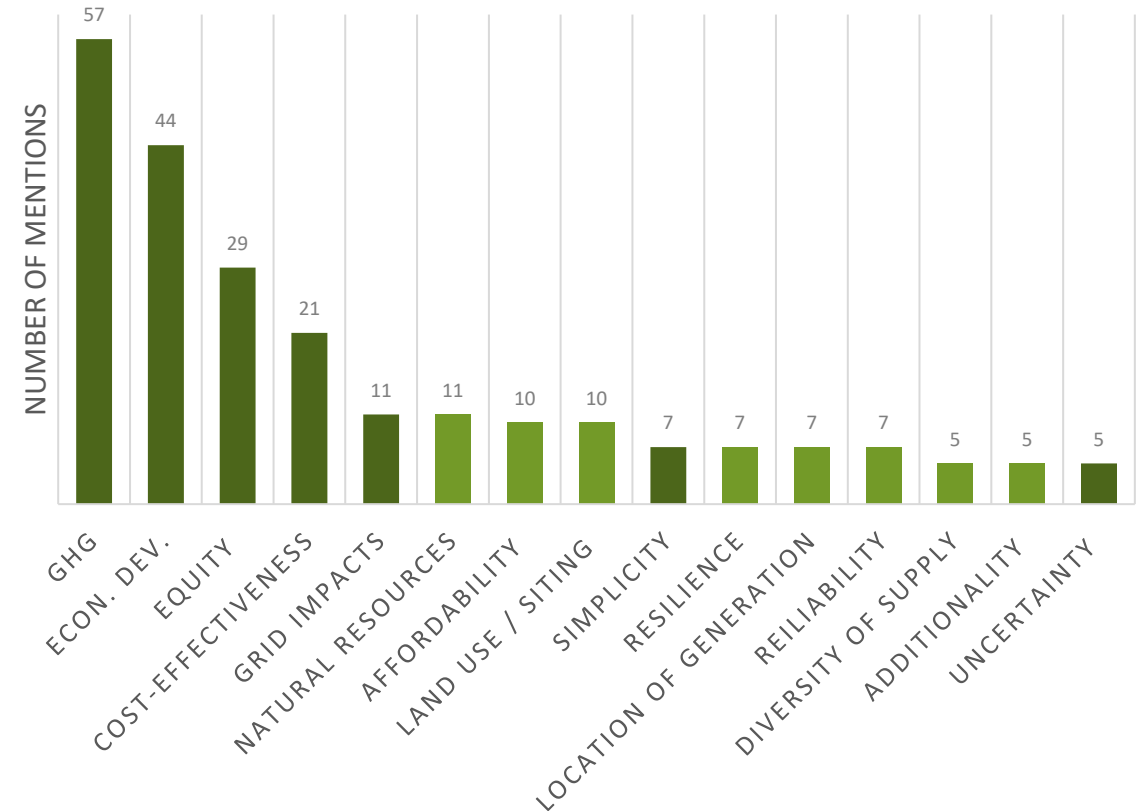
Many responses highlighted criteria identified by the Department in the RFI (highlighted in **dark green** in the graph)

Additional criteria suggested by at least 5 responses are highlighted in **light green**.

Other criteria mentioned included:

- Societal Benefits
- Public health
- Renewability
- Energy yield / return on investment
- Reducing demand
- Timeline to meet goals
- REC transparency

DECISION CRITERIA TO CONSIDER



*Note: Many responses highlighted multiple criteria that should be considered by the Department. That is captured in the data discussed here.

How should these factors be prioritized?

With regards to how various decision criteria should be prioritized, **26 responses** specifically commented on this issue, with a disproportionate number of those responses coming from the webform.

The **top three** most frequently mentioned priority criteria were (in order of frequency):

- Equity
- Greenhouse gas reductions
- Costs impacts & cost-effectiveness

Interestingly, while equity was most frequently cited priority criterion, ability to reduce **greenhouse gases** was **the most frequently cited** top priority criteria.

Two responses suggested **prioritization of criteria was potentially not a useful task**, suggesting a more holistic approach.

Three responses suggested this question (on prioritization of decision criteria) should be **the focus of a public process or workshop** to further refine and discuss. At the VECAN webinar, it was suggested a fact sheet of criteria definitions might be helpful.



Responses to both questions highlight greenhouse gas reduction potential, equity, and cost considerations as core criteria to consider when reviewing policies and programs to advance deployment of and access to renewable electricity.



Many additional criteria to consider were also raised as worthy of inclusion.



Several responses suggested that hosting a workshop or other public process could be useful to further discuss this issue and identify priority criteria.



Development of a fact sheet regarding existing definitions in the law or that the Department uses could be a useful resource to support this conversation.

Summary & Key Takeaways

Key Issues

WHAT IS WORKING

WHAT ARE CHALLENGES
TO ADDRESS

What are the key issues for consideration?

The Department's RFI also sought to collect initial input on the key issues that should be considered through this process. The RFI asked two questions to prompt thinking on this:

What is Vermont doing well with regards to the deployment of and access to renewable and clean electricity to meet growing demand?

What are key challenges and/or gaps in existing programs and policies that should be considered in this process?

What are the key issues for consideration?

The Department received many substantive comments on issues related to renewable and clean electricity policies and program in Vermont. Some key themes that emerged are highlighted below:

What is Vermont doing well:

- Advancing the presence of renewable electricity in the state
- Supporting deployment of solar, particularly through the net-metering program to allow individuals to participate
- Utility program offerings (ex. those by Green Mountain Power) and incentivizing new technologies

What challenges should be addressed:

- Renewable and clean electricity resources and technologies considered
 - Diversity of resources types (nuclear, Hydro Quebec, wind, solar)
 - Characteristics: size (utility or community scale), location, age (additionality), health impacts, load management and aggregations
 - Overall and in-state percentage requirements
- Use of renewable energy credits (RECs) and transparency
- Equity – access, affordability (rates, incentives), ownership ability
- Program and policy complexity / feasibility
- Connections to the thermal / transportation sectors
- Reliability, security, and resilience; Infrastructure updates
- Financing solutions
- Workforce development



The responses to the RFI highlight the complexity of the topic under consideration (Vermont renewable and clean electricity programs and policies) and the ways considerations extend beyond the types of resources that produce electricity.



Holistically and comprehensively addressing the issues highlighted will take time, a shared understanding of terms, and careful scoping of what can be accomplished within this process and what issues may be addressed in complementary processes, programs, and policies.



The responses received will be used to inform public engagement opportunities moving forward, including the content of education-based forums and webinars to help cultivate a shared understanding of the core issues under review.

Summary & Key Takeaways



Next Steps

WHERE DO WE GO FROM HERE

There was generally stronger support for a longer timeline, engaging a broad array of stakeholders, and utilizing several different engagement methods to review renewable and clean electricity programs and policies.

Next Steps:

- The Department intends to pursue a longer timeline for the review, between 12-18 months.
- This process will aim to deliver program and policy recommendations in advance of the 2024 legislative session.
- The Department is in the process of developing a Public Engagement Roadmap to illustrate what this process might look like and hopes to release this document in mid-November for review.

Summary & Next Steps

Responses across multiple questions recognize the complexity of the topic under consideration. Holistically and comprehensively addressing issues highlighted here and those that emerge as the process unfolds will take time and a shared understanding of terms and concepts.

Next Steps:

- The Department intends to begin the review process by providing educational and capacity building engagement opportunities to help raise awareness of this effort and build a common understanding of existing programs and policies as more stakeholders come to the table.
- The Department will continue to review and synthesize the responses received in the RFI which will be used to inform public engagement opportunities moving forward, including the content of education-based forums and webinars.

Summary & Next Steps

Issuing a Request for Input (RFI) to the public on the process for conducting such a policy and program review represents an initial step from the Department to respond to calls for more meaningful public engagement. Throughout the process, the Department received feedback that the RFI was technical and challenging for folks not deeply engaged in this work to understand. The Department also heard feedback on the need to better advertise such opportunities and meet people where they are in the future on these topics.

Next Steps:

- The Department is committed to pursuing more innovative marketing and communications for engagement opportunities like these to seek to reach more than “the usual” stakeholders.

Summary & Next Steps

Many different organizations and communities in Vermont should be at the table when discussing the renewable electricity policies and programs. Some of the organizations highlighted are already at the table while others are not. The Department is aware, for example, that not all communities were reached by or responded to this Request for Input.

Next Steps:

- The Department is considering how to best reach each of the communities mentioned through a combination of partnerships with organizations and targeted marketing and communications, which it will reflect in the Public Engagement Roadmap.
- Understanding that not all relevant stakeholders participated in this RFI, the Department aims to develop a Public Engagement Roadmap to guide the initial steps of this process, while leaving room for modification and flexibility as additional voices come to the table.

Summary & Next Steps

Questions or comments about this report or next steps in the process to review renewable electricity programs and policies? Please don't hesitate to reach out to the Department:

Contact: PSD.REPrograms@vermont.gov

Summary & Next Steps