

Appendix B

Renewable and Clean Electricity Policy and Program Review

Public Comment Summary & Changes to the Draft Plan:

Overview

From November 27th – December 20th, 2023 the Department of Public Service released [a draft report](#) on the process taken to review clean and renewable electricity policies and programs, key takeaways, and reflections on the process to date. During that time several comments were submitted which the Department carefully reviewed and used to inform the final version of this report.

Slides 34-36 of the final report provide an overview of how the public comment period was conducted, who participated, and a high-level summary of the comments.

This Appendix provides additional details on the comments received and changes made to the report as a result.

Comments Received:

Overall themes (also described slide 36 of the final report):

Several high level themes emerged from many of the comments submitted during the public comment period. These included (with examples):

- Cost concerns & need for more financial analysis regarding the impacts of policy and program changes.
 - o Example: A few comments were specifically opposed to policy changes being forced on Vermonters especially those raising costs and impacting affordability
- Comments supporting the need to take a holistic perspective of the issues impacting renewable and clean energy and climate more broadly.
 - o Example: Thinking beyond electric supply, several comments expressed the need to consider reducing demand for energy (conservation, efficiency) as a more cost-effective option.
 - o Example: Thinking beyond the electric sector, several comments pointed towards considerations related to the transportation (electric vehicles), thermal sectors, and related electrification, including being transparent about how costs related to those sectors were or weren't factored into the Department's analysis
 - o Example: Several comments referenced the importance of thinking about lifecycle perspectives on technologies, their materials, source location, and impact and/or emissions.
- The need for transparent data and assumptions.
 - o Example: A comment highlighted transparent data should be a key priority, noting the role of reliable and honest data in assessing progress
- Programs to operate in parallel to policies will be important, particularly to mitigate costs and support the most vulnerable & advance key priorities mentioned (ex. reliability)
 - o Example policies mentioned included: Rate design to shift burdens from those most impacted by and/or vulnerable to costs; Tax policy support; Financial support through state and/or federal incentives and financing (particularly to reduce barriers for participation)
 - o Example comments:

- Some comments noted the need to highlight existing programs (i.e. better communicating opportunities for incentives or rebates) to help mitigate costs without duplicating efforts
 - Several comments, particularly at one of the virtual workshops, highlighted the need for community involvement in siting and expressed a desire for a template for community solar to increase buy-in and viability of projects, deliver local benefits beyond just renewable generation, and support greater participation of low-income households
 - Several comments noted the need to incentivize reducing consumption
- The Department received several comments appreciating the outreach effort but noting there is more work to do in terms of accessibility of information, continued outreach to bring more individuals into the conversation, and educational opportunities
- At least two comments voiced questions and/or concern about whether decision makers will see or use the outputs of this process

Comments Specific Related to Takeaways

- Key takeaway 1:
 - Heard support for all three priorities from many commenters via the webform;
 - One comment specifically noted a need to better understand what people mean when discussing reliability – likely intertwined with issues of resilience, not necessarily in alignment with how the state defines reliability in a technical sense;
 - Only additional key priorities mentioned were: reliability & honesty of data in assessing progress (x1); conservation of energy (x2)
- Key takeaway 2:
 - One comment highlighted the need to find ways to mitigate costs (while not getting bogged down in weighing tradeoffs) through avenues such as federal funds, more coordinated planning, rate design, and cost allocation;
 - Multiple comments mentioned concerns regarding costs and that they outweighed benefits
- Key takeaway 3:
 - Comments illustrated support for diversified portfolio of resources overall; mixed support for nuclear & biomass & wind was voiced consistent with comments made during the engagement effort; some concerns were noted regarding the ability for wind and solar alone to support demand;
 - One comment was explicitly not supportive of total clean energy; one comment explicit that supported renewable only (not clean);
 - A comment highlighted that it was not technology type per se but more the scale/location/benefits and burdens to local communities (and ecosystems) that stuck out in conversations about resource preferences;
 - Connections to conservation were noted
- Key takeaway 4:
 - General support for the takeaway, although one comment highlighted concern regarding cost and reliability given current status of the system;
 - Need to better define vulnerable Vermonters & be specific in how policies and programs are benefiting communities;

- Need mechanisms to involve communities in siting of all infrastructure;
- Highlighting and not duplicating existing supporting programs;
- Encouraging change with incentives not requirements
- Key takeaway 5:
 - Concerns noted regarding willingness and ability to understand this level of granularity (sub-annual renewability) but recognized the importance of the topic, needing to take a regional/national approach & take advantage of incentives; infrastructure upgrades & supports to all utilities;
 - Analyses need to be supported by greater data transparency;
 - Reliable baseload necessary, need to consider storage, load flexibility, and rates

Changes to the takeaways following public comments:

- Key Takeaway 1: No change as the Department felt comments generally supported this takeaway and no new significant priorities were raised.
- Key Takeaway 2:
 - Previous Wording: The modeling highlights that a move toward a 100% Renewable or Clean Energy Standard from the current policy will face tradeoffs between costs to ratepayers (i.e. impacts on their bills) and societal benefits related to emissions reduction.
 - Change: ~~The modeling highlights that~~ A move toward a 100% Renewable or Clean Energy Standard from the current policy will face tradeoffs between costs to ratepayers (i.e. impacts on their bills) and societal benefits related to emissions reduction. **Any policy modification should be accompanied by data collection mechanisms to transparently track and evaluate ongoing costs of the policy and impacts to affordability for ratepayers. Additional consideration of supporting policies, programs, or funding opportunities to further mitigate costs is warranted.**
 - Notes: Wording was changed to acknowledge comments about the need to mitigate costs with supporting programs and needing to transparently track ongoing costs and monitor concerns about costs.
- Key Takeaway 3:
 - Previous wording: There is general support for solar, wind, and hydropower as sources of electricity. Support for nuclear and biomass is more mixed, although a majority from the statewide polling at least somewhat supported every resource.
 - Change: ~~There is general~~ Vermonters generally support ~~for~~ solar, wind, and hydropower as sources of electricity **whereas** support for nuclear and biomass is more mixed. **Often, conversations on this topic emphasized characteristics such as size of the generation source, it's location, and benefits and burdens experienced by the host community and natural resources as more important than the technology type. although a majority from the statewide polling at least somewhat supported every resource.**
 - Note – Change reflects comments received about resource characteristics that seemed equally if not more important than the resource type itself.
- Key Takeaway 4:

- Previous Wording: Many Vermonters are at least somewhat supportive of policy and program changes that increase requirements for low carbon and renewable electricity in a way that supports the most vulnerable Vermonters
 - Change: Many Vermonters are at least somewhat supportive of policy and program changes that increase requirements for low carbon and renewable electricity in a way that supports the most vulnerable Vermonters. **Any policy or program modification should consider which Vermonters are most vulnerable to potential outcomes of increasing Vermont's supply of clean or renewable electricity and specific mechanisms to support them.**
- Key Takeaway 5: No change made

Other major changes made to the report between the draft and final:

- Slide 3 – Revised the introduction
- Slide 6 – Added a summary of the policy and program recommendations emerging from the process (new)
- Slide 7 – Now provides one slide with links to all materials from the engagement effort (new)
- Slides 10-12- Reordered for clarity and added some text to slide 12 about where to get more information on the current Renewable Energy Standard
- Slides 34-36 – Added an overview of the public comment period (Phase 3 public engagement plan) (new)
- Slides 54-61 – Recommendations section describing policy and program recommendations (new slides)
- Slides 67-70- Goals accountability self-assessment on how the Department achieved its goals for public engagement (new slides)
- Appendix B (public comment) and Appendix C (Department's changes to Title 30) added