



MEMO

TO: Anne Margolis, Claire McIlvennie, Department of Public Services

FROM: David Snedeker, Executive Director

DATE: August 14, 2023

RE: NVDA's Request for Regional Approval of Energy Planning Standards

Hello. The Northeastern Vermont Development Association (NVDA) recently voted to update and readopt its regional plan in accordance with 24 VSA 4843b, which allows regional planning commissions to update and readopt a regional plan that is approaching expiration.

<https://legislature.vermont.gov/statutes/section/24/117/04348b>

An updated assessment report was prepared in accordance with statute, and we held two hearings to solicit public comment. We received no comment from the general public, and the NVDA board voted to adopt the plan on July 29, 2023. (Voting was electronic.)

We are preparing a formal request for regional certification. As part of that request, we would like to confirm the following points, based on earlier conversations with NVDA staff:

Standards 4B-D, Standard 5 targets: These are currently broken out by municipality using the old LEAP projections, as there was no time to incorporate the new LEAP analysis. Allie Webster is currently working to municipalize new LEAP projects, in collaboration with other RPC energy planners, and the new NVDA regional plan will use the latest LEAP projections. In the meantime, we will be posting the following disclaimer on our webpage with the regional plan:

“Please note that NVDA’s Regional Plan was updated and readopted on July 29, 2023 in accordance with 24 VSA 4348b, which allows regional planning commissions to readopt plans that are approaching expiration. In accordance with statute, we have prepared an Assessment and Report. The report addresses the new requirement for certification of regional plans by the Department of Public Service, including equity requirements. The plan update, however, does not include new municipal breakouts of LEAP analysis, as the new LEAP analysis was being completed just as the readoption of the plan commenced.

NVDA is working on a new regional plan that will incorporate new municipal targets for 2023 LEAP projections, and we will begin making this information available to towns as soon as

possible. In the meantime, the existing municipal energy targets, based on 2018 data, can be found in the [Appendix](#) of the energy plan. This data is valid until new data is available.”

Standard 13: Unsuitable areas: NVDA’s unsuitable areas remain unchanged from the 2018 plan, and they are re-stated in the Assessment report. These are also cited in the Regional Land Use Plan. They are lands that contain one or more of the following attributes: State natural areas and fragile areas: The region has two such areas, which are both designated as National; Natural Landmarks, the Willoughby Cliffs area and the Barton River Marsh; Lands managed by the Department of Forest Parks and Recreation; highest priority forest habitat blocks; Forested coverage of Site Class 1, 2, and 3 soils of 25 acres or more; Headwaters; Upland areas of 2,000 or higher.

These lands are subtracted from the energy resources map, rather than outlined, as the map would be busy and difficult to understand.

Standard 12D: Our electric utility service areas, as well as major transmission lines, as well as the VELCO/SHEI constraint area are shown on [figure 2.4](#) of our existing energy plan. Transportation maps are in Volume III of our [Transportation Plan](#).

One of the important goals of our new regional plan will be to consolidate data and make information easier to index and locate. In the meantime, we appreciate your patience as we work to keep our regional plan current.

Please do not hesitate to reach out with any questions.

Sincerely,



David Snedeker
Executive Director