

Public Service Department Request for public comment and stakeholder engagement on modeling questions to support the 2022 Comprehensive Energy Plan.

December 8, 2020

The Vermont Public Service Department is asking for public input to help update the Vermont Comprehensive Energy Plan (CEP) required by 30 V.S.A. §202b. This is an opportunity for the public to participate in identifying and clarifying policy and technology pathways to reach Vermont's energy goals.

The CEP is a distinct requirement from the Climate Action Plan being developed by the Vermont Climate Council¹ appointed as part of the Global Warnings Solutions Act (GWSA), although the two efforts do overlap in several areas. Most directly, the CEP is expected to meet the greenhouse gas reduction requirements of 10 V.S.A. 578 and be consistent with the Vermont Climate Action Plan adopted pursuant to 10 V.S.A. § 592, part of which involves coordinating modeling baselines and assumptions to provide clarity and foster efficiency between the two efforts.

The State's energy and greenhouse gas goals are informed by the statutory foundation of the State's energy policy as stated in 30 V.S.A § 202a:

- (1) To ensure, to the greatest extent practicable, that Vermont can meet its energy service needs in a manner that is adequate, reliable, secure and sustainable; that ensures affordability and encourages the state's economic vitality, the efficient use of energy resources and cost effective demand side management; and that is environmentally sound.
- (2) To identify and evaluate, on an ongoing basis, resources that will meet Vermont's energy service needs in accordance with the principles of reducing greenhouse gas emissions and least-cost integrated planning, including efficiency, conservation, and load management alternatives; wise use of renewable resources; and environmentally sound energy supply.
- (3) To meet Vermont's energy service needs in a manner that will achieve the greenhouse gas emissions reductions requirements pursuant to 10 V.S.A. § 578 and is consistent with the Vermont Climate Action Plan adopted and updated pursuant to 10 V.S.A. § 592.

The [2016 CEP](#) followed an extensive process to evaluate the options available to meet the State's goals and targets. This included a Regulatory Assistance Project "[Framing Report](#)," a "[Total Energy Study](#)," and significant stakeholder involvement. Concurrent with this Request for Input, the Department has published its current stakeholder engagement plan. The aforementioned documents provided overviews of some of the most promising technologies (e.g. electric vehicles, heat pumps, biomass heat, solar power, etc.) and policies (e.g. carbon based fees, renewable portfolio standards, smart growth policies, etc.) available to Vermont at the time. With this context in mind, **the Department requests and welcomes written comments with regard to the previously identified technologies and pathways, or new ones that have materialized since the last Comprehensive Energy Plan. The Department also invites comments with regard to any or all of the particular questions below.**

¹ See <https://aoa.vermont.gov/content/vermont-climate-council>

- 1) The Framing Report, Total Energy Study, and 2016 Comprehensive Energy Plan identify and describe what were the key technology and policy pathways available to the state at the time.
 - a. Are there policies or technologies that should be considered as “key policies” or “key technologies” that were not previously identified?
 - b. Have identified “key policies” or “key technologies” changed over the last several years in ways that make them more or less viable options to meet Vermont’s goals and requirements?
 - c. What do you think are the most promising policies and technologies, or combinations of policies and technologies, available to the state?
 - i. Which complement each other and which are incompatible?
 - ii. Which are most urgent to adopt in the near-term, and which should be implemented or encouraged over a longer time-frame?
 - iii. Which address equity and environmental justice considerations, and which ignore them?
 - d. What are the most important considerations the State should weigh in determining which policies or technologies are worthy of further consideration and study?
 - i. Examples could include robustness of policy choices in the face of future uncertainty, total costs, economic impact, timing of policy or technology, etc.
- 2) Should this study restrict its analysis to what Vermont can do alone (physically, economically, etc.), or should it also analyze the potential additional paths possible with regional coordination and resources and/or Federal action? Are there policies and technologies that are promising to pursue but require regional or Federal action implementation efforts to be effective? If these should be included in the scope of this study, what are the best methods the State should use to pursue these types of policies or technologies?
- 3) The 2022 CEP will consider costs and benefits of key policy and technology pathways. What types of costs and benefits should be considered? For example, should costs and benefits only be considered if they are Vermont specific, region-wide, or global? How should transfers of costs be considered?

Following review of comments, the PSD expects to engage in discussions with small and diverse groups of stakeholders to discuss the issues raised in this Request as well as issues raised by commenters. The goal of the current Request for Input is to assist in narrowing the wide range of policy and technology scenarios to a manageable number well suited for quantitative analysis. Information on the CEP update process, including the above referenced documents can be found at <https://publicservice.vermont.gov/content/2022-plan>. The Department welcomes comments on the above issues and any others that may be identified. Please send written comments by Jan 15, 2021 to PSD.ComprehensiveEnergyPlan@vermont.gov