

Request for public comment and stakeholder engagement on “Total Energy Study” Framing Report

Public Service Department

June 21, 2013

The Public Service Department is undertaking a “Total Energy Study” to identify the most promising policy and technology pathways to employ in order to reach Vermont’s energy and greenhouse gas goals. This study is required by [Act 170 of 2012](#), as modified by the legislature during the most recent session. The State goals that the study will address are to 1) meet 90% of Vermont’s energy needs from renewable sources by 2050 and 2) reduce Vermont’s greenhouse gas emissions to 25% of 1990 levels by 2050. 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 assure, to the greatest extent practicable, that Vermont can meet its energy service needs in a manner that is adequate, reliable, secure and sustainable; that assures 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.

With this context in mind, the Department has taken an initial step to begin to evaluate the options available to meet the State’s goals by commissioning the Regulatory Assistance Project to provide the attached Framing Report, which is intended to provide an overview 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. The primary purpose of the Framing Report is to facilitate public and stakeholder feedback and discussion.

The Department welcomes written comments on any and all aspects of this Framing Report and/or general comments with regard to the Total Energy Study. The Department also invites comments with regard to any or all of the particular questions below.

- 1) The Framing Report identifies and describes what the authors consider to be the key technologies and policy pathways available to the state.
 - a. Are there policies or technologies that should be considered as “key policies” or “key technologies” that are not identified as such in the main body of the report?
 - b. 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?
 - c. What are the most important considerations the State should weigh in determining which policies or technologies are worthy of further consideration and study?
 - i. Example considerations might include the achievability of State targets by using a particular policy or technology, robustness of policies or technology choices in

the face of future uncertainty, total costs, allocation of costs or benefits, economic implications, or the time-frame of the impact of a policy or technology.

- 2) Should this study restrict its analysis to what Vermont can do alone, or should it also analyze the potential additional paths possible with regional coordination or Federal action? Are there policies and technologies that are promising to pursue but require regional or Federal actions in order 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) In defining technology and policy pathways, what principles should guide the development of the “baseline case” – i.e. the case to which policy and technology pathways should be compared? For example, how should current programs that save energy or reduce greenhouse gas emissions be treated in the baseline case? Should it be assumed that they continue at current levels, ramp up, or ramp down?

Following review of comments, the Department will convene a number of small-group meetings with diverse stakeholders to discuss the issues raised in this Request as well as issues raised by commenters. The goal of the public comments and stakeholder process is to assist the State in narrowing the wide range of policy and technology scenarios to a manageable number well suited for quantitative analysis. This quantitative analysis will begin in the fall, leading to a report to the Legislature in December, as well as continued analysis and additional reporting in 2014.

The Department welcomes comments on the above issues and any others that may be identified. Please send written comments by July 22, 2013 to PSD.TotalEnergy@state.vt.us.