

June 29, 2023

ATTN: Vermont Public Utilities Commission

RE: Case # 23-1870-PET

Dear Commissioners,

I am very concerned about Burlington Electric's request to divert hundreds of thousands of dollars in energy efficiency funds on their relentless push for the misguided District Energy Project- a steam pipe which will run from the McNeil Biomass incinerator to the hospital.

The District Energy Project does not meet the "highly efficient" requirement set by the PUC.

This project has been mischaracterized as an energy efficiency measure in spite of the fact that it will require more chipped trees to be burned (thus increasing CO2 emissions) and will, by BED's own account, only result in a paltry increase in efficiency of 3% from an abysmal 23%. Compare this to almost any other fuel source, including a typical coal plant which is 33% efficient. Just as no environmentally aware utility manager would advocate for a coal plant, they should not be advancing a measure that would prolong the life of a biomass plant which should have been mothballed years ago.

The District Energy Project does not meet the "cost effective" requirement set by the PUC.

The latest price for this District Energy Project is \$42 million dollars- an outrageous sum that will result in a marginal improvement to a still highly inefficient plant- a plant that is quite frankly much more efficient at generating CO2 than it is at generating electricity.

One can think of any number of ways to spend \$500,000 that could easily meet PUC requirements. This project is not one of them. At a time when, in the words of the Burlington City Council, the Climate Emergency requires a World War II scale mobilization, we cannot afford to divert our precious energy efficiency dollars away from projects that truly serve the public good.

I respectfully ask that you deny BED's request and, furthermore, that you do not waive the 60-day notice requirement.

Best Regards,

Ashley Adams

Burlington