

July 2, 2023
Public Utility Commission
Re: Case no. 23-1870-PET

I write to you to urge you to reject the use of \$500,000 of thermal efficiency and process fuel (TEPF) funds and not waive the 60 day advance notice requirement for the proposed steam pipe between the McNeil wood-burning station and the UVM medical center in Burlington. This project is neither energy efficient nor cost-effective, and does not provide widespread benefits to the ratepayers of Burlington Electric Department (BED) or other Vermont energy users. The McNeil plant currently operates at around 26% efficiency, and BED-commissioned studies suggest the steam pipe will raise the plant's efficiency to 29%. 29%, however, is still a stunningly low efficiency when compared to any other energy technology, whether heat pumps or even home wood heating. The PUC should not allow public funds to go to a project that will sink a total of approximately \$42 million into a fundamentally inefficient and highly polluting plant and further commit BED to operating this plant for decades to come. Additionally, as noted in BED's own petition, BED has already overspent a generous allotment of TEPF funds on the steam pipe proposal, further demonstrating that the project is not cost effective.

The steam pipe would also not bring any benefits to the vast majority of BED ratepayers and Burlington residents. The steam pipe is primarily being planned to serve just *one* customer, the UVM medical center, and will not supply any efficiency benefits to residential or other commercial customers beyond a few select institutions. Vermont Gas systems plans to purchase thermal energy "credits" from the steam pipe to allow it to meet renewable energy requirements while still supplying customers with the same fossil gas. This would create a perverse situation in which one highly polluting, inefficient source of energy (the McNeil wood burner) is used to prop up another highly polluting, inefficient energy source (natural gas heating in old, improperly insulated buildings).

By way of comparison, Burlington (like most of Vermont) has a housing stock that on balance is very old and poorly insulated. Weatherization has consistently been shown to be a highly cost effective, immediate and durable means of increasing energy efficiency and reducing energy use, and comes with numerous other benefits like decreasing the energy burden for low income people. The proposed steam pipe, meanwhile, will not meaningfully reduce energy use or energy costs, and will facilitate the continued using of fossil gas in the area through its generation of sham "credits" to be used by Vermont Gas Systems. Please reject the use of \$500,000 of TEPF funds and not waive the advance notice requirement for the proposed BED steam pipe, and instead ensure that thermal efficiency funds go to weatherization and other proven, highly cost effective means of increasing efficiency.

Respectfully,
Chris Gish
Burlington, VT