

Public Utility Commission

Re: Case # 23-1870-PET

Dear Commissioners,

I submit these comments as a Burlington resident and Burlington Electric ratepayer.

The Commission should deny Burlington Electric's petition requesting transfer of \$500,000 of TEPF funds from traditional TEPF programs such as weatherization to "District Energy System" support. Burlington Electric's petition makes no effort whatsoever to show that the proposed district transmission system is "highly energy efficient," or that the proposed conversion of UVM Medical Center from using fossil fuels to district heat from the proposed system is "cost-effective." Indeed, it is clear that neither standard is met.

As an initial matter, Burlington Electric has failed to make available to the public and the Commission as part of this docket, detailed information from which findings that the proposed transmission system is "highly energy efficient," or that the conversion of the single Burlington Electric customer slated to be connected to the system from fossil fuel to district heat is cost effective could conceivably be made. This failure compels denial of the petition. And there is no basis whatsoever to grant a waiver of the notice period.

While the public is kept largely in the dark, it is obvious that the project is grossly inefficient. The McNeil Generating Station is horrifically inefficient, converting only approximately 25% of the biomass energy fed into the plant to electricity. And the proposed distribution system, which will include increasing the amount of biomass burned, collecting steam from the plant and sending it uphill by pipe a considerable distance to service a single customer is grossly inefficient as well.

Nor is converting UVM Medical Center to McNeil district heat cost effective. The costs of the project- reportedly more than \$40 million- are staggering. It would be far more cost effective for UVMC to continue using gas, or, if it needs a new thermal energy system, to site the system at the Medical Center. This is especially true if you consider the externalities of the project- the heavy cost imposed on the environment and the public by the proposed project- including the increase in greenhouse gas emissions and destruction of forest biodiversity that would result from the project, and the inconvenience to the public from streets being torn up for the steam pipe, etc.

The fact that lobbyists, acting outside of public view, have garnered substantial subsidies for the project does not make it cost effective. The money could be better spent elsewhere.

Burning biomass puts more carbon dioxide into the air than burning any fossil fuel, including coal. Serman, et al., *Does wood bioenergy help or harm the climate?*, Bulletin of the Atomic Scientists, Vol 78, No. 3 (2022) 130. McNeil is the largest stationary source of greenhouse gas emissions in Vermont. It emitted 453,000 tons of carbon dioxide in 2021. It also emits substantial amounts of other harmful air pollutants, including fine particulate matter. The so-called district energy project is a thinly veiled effort to garner support for keeping the plant, which should be shut down now, operating for many more years.

Not a single penny of TEPF funds should be diverted from real climate solutions like weatherization to polluting, destructive, false climate solutions including McNeil "district energy."

Thank you for considering my views.

/s/ Nick Persampieri

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