

At each stage in the design process, we welcome thoughtful and creative input on all relevant issues.

Thoughts on Using the AHA to Reach Act 59, 2023 “30 X 2030” Goals

Whereas the AHA is designed to reduce carbon-emissions pollution created by the thermal sector, and;

whereas preserving forest land does not directly reduce carbon-emissions in the thermal sector but can reduce carbon-emissions pollution in the atmosphere, and;

whereas “advanced wood heating systems” are included among the eligible measures even though wood systems have a higher carbon intensity value than the fossil fuels systems they replace, and;

whereas it will be necessary to have several, perhaps many “designated delivery agents” (DDAs) to provide the eligible measures needed for the obligated parties (OPs) and some OPs might also be DDAs, and;

whereas “clean heat credits” are an intangible, arbitrary construct designed to reward activities that reduce our carbon-emissions, and could additionally be designed to achieve other goals such as storing carbon, and;

whereas the legislature recently enacted Act 59, 2023 with the goal of conserving 30% of Vermont’s land by 2030 and 50% of Vermont’s land by 2050, and;

whereas, if we value land conservation and carbon-sequestration, we should reward these activities, and;

whereas the PUC has requested “creative input on all relevant issues,”

I propose that land conservation be considered a “clean heat measure,” and landowners who agree to conserve their land will be eligible to receive clean heat credits based on the amount of additional carbon their land sequesters annually. As these credits do not directly reduce carbon-emissions in the thermal sector, an OP could use these “clean carbon storage credits” for only a percentage of the OPs annual requirements.

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