STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 23-2221-INV

Investigation into the Clean Heat Standard Default Delivery Agent Costs and Quantities	

Order entered: 04/26/2024

ORDER ON THE ROLE, NUMBER, AND STATUS OF DEFAULT DELIVERY AGENTS(S) IN THE POTENTIAL CLEAN HEAT STANDARD PROGRAM

I. INTRODUCTION

On June 30, 2023, the Vermont Public Utility Commission ("Commission") issued an order opening this investigation to establish the Default Delivery Agent ("DDA") credit cost or costs, the quantity of clean heat credits ("credits") to be generated for the subsequent three years, and all other directly related matters, pursuant to 30 V.S.A. § 8125(e)(1).[1] Following public input as to the scope and process to be used in this proceeding, the Commission adopted a schedule that included the first step to address the possible number of DDAs, as well as DDA obligations and responsibilities. In this Order, the Commission lays out the anticipated role, number, and status of DDA(s) in the potential Clean Heat Standard system.

II. PROCEDURAL HISTORY

On December 11, 2023, the Commission issued an order requesting comments on "Default Delivery Agent Obligations, Responsibilities and Number" with a comment deadline of December 22, 2023. Comments were filed by the Vermont Department of Public Service ("Department"), Vermont Energy Investment Corporation ("VEIC"), the Vermont Fuel Dealers Association ("VFDA") and the Heating and Cooling Contractors of Vermont ("HCCV"), Vermont Gas Systems, Inc. ("VGS"), and Thomas Weiss. On January 25, 2024, the Commission convened a workshop on the topic of the possible number of DDAs and their obligations and responsibilities. Reply comments were filed by the Department, VEIC, VGS, Thomas Weiss, and Renée Carpenter.

[1] For an overview of the work done to date and other information on the proposed Clean Heat Standard, please see the Commission's clean heat website at https://puc.vermont.gov/clean-heat-standard.

III. DISCUSSION

Commission Use of Public and Participant Comments

The request for comments issued on December 11, 2023, asked participants to provide input on: (a) the optimal number and geographic scope of DDA(s), (b) reporting and information sharing, (c) the scope of work and budget building, (d) required work areas, and (e) interactions with other parts of the potential Clean Heat Standard. Based on the feedback received in this round of comments, discussions had by the Equity and Technical Advisory Groups, and the remaining questions to be resolved in this schedule, the Commission is deciding a narrower set of questions in this Order than originally asked in the request for comments.[2]

The comments the Commission received make clear that a well-designed DDA(s) could incorporate many and varied functions and design elements. At this early stage we conclude that it would be premature to specify these exact functions and elements. Rather, we propose to provide a broad framework for the DDA(s) and leave room for later process to refine the scope of services that may be delivered through a DDA. At a later stage, the Commission intends to further refine the DDA concept through a more staged and interactive process that includes a Request for Information and/or a Request for Proposals to select the DDA.

The Commission's decisions outlined in this Order are intended to provide enough information to proceed to the next steps in this process while leaving sufficient flexibility for multiple outcomes as the Clean Heat Standard program and the DDA role are further developed. These decisions focus on the central function, the number, geographic and functional scope, treatment of transferred obligations, and regulatory approach for the supervision of DDA(s). We appreciate the input received on the other important topics, including budget building, noncompliance payment usage, credit tracking, and clean heat measure prioritization; those topics are beyond the scope of this Order and will be addressed in due course.

To move forward in this proceeding, the Commission has organized the listed topic areas into three core components that are answerable at this stage: the central role of the DDA(s), the number of DDA(s), and the framework for regulatory oversight of DDA(s) in the potential Clean

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[2] *Order Requesting Comment on Evaluation Criteria, Eligibility, and Compensation Structure for Default Delivery Agents*, Case No. 23-2221-INV, Order of 2/22/24.

Heat Standard system. In deciding the optimal number of DDA(s), the Commission considered potential differences in the kinds of services that an administrative DDA might direct, and the optimal type of supervision by the Commission. In deciding the regulatory status of the DDA(s) in the potential Clean Heat Standard system, the Commission considered the appropriate level of information sharing and the way credit retirement requirements would pass from an obligated party to a DDA. In addressing both questions, the Commission considered how the DDA(s) would be regulated.

The Role of DDA(s)

The underlying question in this Order is what function the DDA(s) should fulfill in the potential Clean Heat Standard system. Chapter 94 of Title 30 of the Vermont Statutes Annotated addresses DDA function in a number of sections: Section 8122(c) identifies the primary role of DDA(s) to be the default agent for delivery of clean heat measures ("measures") on behalf of obligated parties; Section 8123(7) defines the role as an entity that provides services that generate such measures; Section 8125(a) directs the Commission to provide for the development and implementation of statewide clean heat programs through DDA(s); Section 8125(d)(4) directs DDA(s) to directly or indirectly deliver measures to end-use customers; Section 8125(e)(1)(b) suggests that DDA(s) may participate in promotion and market uplift, workforce development, and training for clean heat measures as part of its role in the market; Section 8125(f) directs the usage of noncompliance funds by DDA(s); and Section 8125(g) requires DDA(s) to create specific programs for specific building types.

Comments

VEIC suggests that a DDA's responsibilities should mirror the administrator role currently fulfilled by energy efficiency utilities ("EEUs"), including a focus on encouraging market growth. VEIC draws a distinction between an administrative or facilitative role and a direct installer role, asserting that a DDA should focus on "providing services, administration, and market support for clean heat measures that are harder to attain and therefore would benefit from a form of regulated service."

VGS emphasizes its belief that a market-based approach is the best way to achieve thermal emission reductions and is in line with the intent of Act 18. In reply comments, VGS articulates an approach that relies on each individually qualified DDA participating in a competitive bidding structure that, when combined with obligated parties, would yield the lowest-cost credits through the discipline of a market-based structure. VGS suggests creating a system that allows for the most cost-effective greenhouse gas reductions to be delivered directly by DDA(s) and suggests the Commission should not set any predetermined limitations on the nature of DDA(s) in order to evaluate future applicants' ability to deliver reductions cost-effectively. VGS encourages the Commission to consider the strengths of different potential DDA(s) in serving different market segments.

Comments filed on behalf of the VFDA and the HCCV recommend that the DDA(s) be limited in scope and responsibility to what is necessary to manage the use of alternative compliance payments.

The Department contends that any potential DDA should be prepared to carry out most functions described in 30 V.S.A. § 8125 and makes suggestions for the roles of single or multiple DDA systems. If multiple DDAs are appointed, the Department believes that: (1) appointed entities must demonstrate the capacity to provide services statewide, either by themselves or through partnerships, even if they are not currently serving a statewide population, and (2) the Commission should clearly define the DDAs' scope of work so as not to overlap with one another or with pre-existing programs, which could lead to confusion, inefficiency, and lower quality of service. In a single DDA scenario, the Department sees the DDA as an administrator of the program, orchestrating statewide compliance by purchasing credits from several entities and reselling credits to obligated parties as well as promoting efficiency and equity across the state.

Thomas Weiss emphasizes the importance of energy efficiency improvements and weatherization, suggesting that DDAs should heavily prioritize such measures. Weiss suggests that each DDA should be required to provide thermal energy efficiency improvements and weatherization and that such work must be completed before other measures are implemented in a given building. Weiss also suggests defining energy efficiency improvements and requiring thermal process loads to be part of the program for industrial and commercial buildings.

Renée Carpenter identifies the need for a coordinated effort to maximize thermal emission reductions that cut through bureaucratic constraints and avoid unnecessarily complicated and expensive economic structures. Carpenter suggests that this program must create incentives for small businesses, promote training programs, and support innovative technologies, with an emphasis on statewide applicability.

Decision

Through our process to define the DDA role in the Clean Heat Standard, two options have emerged: administration-focused or implementation-focused DDA(s). In the narrowest approach, an administrative DDA could simply act as an aggregator of clean heat credits. In that capacity, the DDA would coordinate the flow of available funds, work, and credit creation and distribution. Such a DDA could employ competitive bidding structures to achieve the market-based discipline envisioned by at least two of the commenters. An administrative DDA could also, where needed, foster cooperative relationships with measure installers and potentially encourage longer-term growth in the market by systematizing repeated interactions with thermal product businesses. Perhaps more importantly, cooperative relationships could be fostered between administrative DDAs, if more than one proved necessary or appropriate.

An implementing DDA would directly implement or very closely support the installation and delivery of clean heat measures. Implementing DDA(s) would be well-positioned to develop a workforce and employ it to directly reduce emissions in Vermont's thermal sector. This approach could also create direct competition between the implementing DDA(s) that had not previously done this work in Vermont and the entities already doing such work in Vermont. An implementing DDA framework, as articulated by VGS, would rely on the Commission itself to certify qualified DDA bidders that participate in a competitive, market-based approach to meet the needs of obligated parties at least cost.

The Commission intends that the DDA(s) will primarily perform a program-administrative role within the potential Clean Heat Standard system. The Commission believes a program-administrative role in a more centralized DDA structure, rather than an implementing role participating in a market-based structure, would be most effective in enabling the equitable decarbonization and transition required by the Clean Heat Standard legislation. An

administrative function is also responsive to participant feedback that asserts that current implementers are effective in their work and would benefit from greater resources (*i.e.*, revenue from credit sales) rather than increased competition from an implementer DDA delivering the same services. The DDA could, however, facilitate healthy competition in the delivery of clean heat credits – for example, by engaging in market-based solicitations among competitive delivery agents, aggregators, and measure installers. It could also facilitate a competitive dynamic by certifying measure installers to help inform choices made by obligated parties outside of a centralized bidding structure.

The Number of DDA(s)

The next question is how many DDA(s) the Commission may appoint. Pursuant to 30 V.S.A. § 8125(a) and (b), the Commission shall appoint one or more DDA(s). Sections 8125(a) and (b) of Title 30 of the Vermont Statutes Annotated provide the following regarding the number of DDA(s) and potential geographic scope:

> (a) Default delivery agent designated. In place of obligated-party-specific programs, the Commission shall provide for the development and implementation of statewide clean heat programs and measures by one or more default delivery agents appointed by the Commission for these purposes. The Commission may specify that the appointment of a default delivery agent to deliver clean heat services on behalf of obligated entities who pay the per-credit fee to the default delivery agent satisfies those entities' corresponding obligations under this chapter.
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> (b) Appointment. The default delivery agent shall be one or more statewide entities capable of providing a variety of clean heat measures. The Commission shall designate the first default delivery agent on or before June 1, 2024.[3] The designation of an entity under this subsection may be by order of appointment or contract. A designation, whether by order of appointment or by contract, may only be issued after notice and opportunity for hearing. An existing order of appointment issued by the Commission under section 209 of this title may be amended to include the responsibilities of the default delivery agent. An order of appointment shall be for a limited duration not to exceed 12 years, although an entity may be reappointed by order or contract. An order of appointment may include any conditions and requirements that the Commission deems appropriate

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[3] The Legislature is currently considering a bill – S.305 – that would remove this June 1, 2024, deadline and instead require the Commission to "approve the first three-year plan and associated budget by no later than September 1, 2025." If this measure passes, the first DDA will likely not be appointed in 2024.

> to promote the public good. For good cause, after notice and opportunity for hearing, the Commission may amend or revoke an order of appointment.

We have considered two factors to inform this decision: competition and the appropriate type of regulation.

Comments

VEIC asserts that a DDA appointment should be made at the statewide level to achieve economies of scale, although VEIC believes it unlikely that any one entity would be capable of providing the entire suite of clean heat measures. VEIC believes that competition among DDAs or between DDAs and existing programs would not be beneficial, raising concerns about customer confusion and disruption of existing collaborative arrangements, and asserts that it would be more beneficial for the DDA to act as a regulated statewide administrator within a performance regulation framework. VEIC agrees that assigning more than one DDA to provide the same service would be likely to create confusion and lead to equity concerns surrounding the variation in pricing among different DDAs providing the same service.

Thomas Weiss argues that multiple DDAs would be necessary to align with the market-based approach of Act 18 to fulfill the large number of clean heat measures that would need to be implemented and to provide the full range of clean heat measures. Relatedly, Weiss argues against giving any DDA a geographic monopoly as it would undercut the competitive approach that has implementing DDAs competing head-to-head in a framework that may be analogous to that envisioned by at least one other commenter. Weiss suggests allowing for multiple DDAs, possibly five, that would each serve the entire state. Weiss concludes that the Commission should allow for multiple DDAs, not fixing a number now but instead being open to whatever number balances competitiveness and administrative burden, and that each DDA should serve the entire state.

VGS suggests the Commission interpret "statewide" broadly and consider a potential applicant's future ability to serve a wider geographic area. VGS recommends that the Commission set the lowest reasonable barrier to entry for potential DDA applicants and establish a framework that allows the Commission to select a set of DDAs that can together deliver the least-cost solutions in Vermont through the market-based approach outlined in its reply

comments. VGS argues that any restrictions would limit the pool of potential participants and create barriers to entry for future DDAs, which could, in turn, limit the supply of credits. VGS argues that minimizing the barriers and restrictions for DDAs would support the intent of the law, which VGS describes as the transformation of thermal energy companies in innovative and cost-effective ways.

Comments filed on behalf of the VFDA and the HCCV recommend that the DDA(s) should be limited in their scope and number to what is necessary to deal with the use of alternative compliance payments.

The Department maintains that it is premature to determine the exact number of DDA(s). The Department asserts it would be unwise to preclude the appointment of multiple DDAs, and if multiple DDAs are appointed, it will be important to ensure that they do not negatively interact with each other or with existing state programs.

Decision

In deciding the optimal number of DDA(s), the Commission considered competition and the appropriate level and style of regulation of DDA(s). 30 V.S.A. § 8125(b) specifies that DDA(s) appointed by the Commission shall be one or more "statewide entities." Commenters envisioned interpretations of this requirement that ranged from an appointed DDA needing to be currently capable of serving the entire state itself to an appointed DDA needing to demonstrate prospectively that it could serve the entire state through partnerships. Taking a more literal interpretation would ensure that all entities participating statewide would have ready access to the services provided by an appointed DDA, but a more flexible approach would widen the pool of possible DDA applicants and allow for more creative arrangements to serve all Vermonters.

Title 30, section 8125(b) specifies that DDA(s) appointed by the Commission shall be "capable of providing a variety of clean heat measures." In recommending how the Commission should understand this requirement's impact on the scope of work of DDA(s), commenters presented a range of views on the desired level of competition around the implementation of different measure types, ranging from an explicit delineation of types of work carried out by each DDA to avoid duplicative efforts (among DDAs or between DDA(s) and other entities) to

explicitly encouraging DDA(s) to compete (with one another and with other entities operating in the thermal sector) to promote cost-effective emission reductions.

The Commission intends for the DDA(s) to serve the entire state or demonstrate a capacity to serve the entire state, either themselves or through arrangement with other entities, within a reasonable timeframe after being appointed. We conclude that this approach meets the statutory intent that DDA(s) serve statewide. As DDA(s) would not be expected to implement measures themselves, DDA(s) would not be in competition with measure-installation contractors or fuel deliverers. However, this program-administrative approach does make space for forms of productive competition among multiple aggregators, installers, and fuel dealers through market-based approaches.

The Commission also considered the type of regulation necessary to ensure that DDA(s) function properly within the potential Clean Heat Standard system. This topic is directly addressed in 30 V.S.A. § 8125(c), which gives the Commission and the Department jurisdiction over DDA(s) under specific subsections of Title 30. Some commenters suggested that DDA(s) be supervised under a performance regulation framework or another regulation plan, while others suggested that DDA(s) be subject to the same penalties as obligated parties for nonperformance.

Given the substantial market influence that would be held by DDA(s), and given the supervision required by 30 V.S.A. § 8125(c), the Commission anticipates implementing a performance-based regulatory system for the DDA(s). This form of regulation could prove resource-intensive and require substantial resources on the part of the Commission, the Department, and the DDA(s). Therefore, appointing a manageable number of regulated DDA(s) would be important for the success of individual DDAs and the program as a whole.

The Commission anticipates that it will appoint a small number of entities as DDA(s). The Commission agrees with the guidance offered by commenters that we not select a specific number of DDAs at this time, but instead balance administrative efficiency when deciding how many appointments to make. The number of DDA(s) to appoint will depend on the number of applicants, the stated capacity and intention of the applicants, and the prevailing conditions in the thermal market. The Commission recognizes the importance of maintaining flexibility as the potential Clean Heat Standard program matures and would consider appointing additional DDA(s) as new needs and potential applicants emerge.

The Regulatory Status of DDA(s)

The last question addressed in this Order is the regulatory relationship of the Commission with the DDA(s) in the potential Clean Heat Standard system. We have considered three factors to answer this question: the regulatory approach for DDA(s), the appropriate level of information sharing required of DDA(s), and the nature of the transfer of obligation from obligated party to DDA.

Comments

VEIC maintains that it would be beneficial for the DDA to act as a regulated statewide administrator under a performance regulation framework. VEIC believes that the acceptance of a DDA appointment should not make the accepting entity into an obligated party and suggests that the relationship between the DDA and obligated parties be similar to that between EEUs and distribution utilities. VEIC contends that the Commission should differentiate how it regulates obligated parties versus the DDA(s).

VGS notes the opt-out model of DDA usage embedded in 30 V.S.A. § 8125(d) and, therefore, views a DDA's acceptance of its appointment to constitute an agreement to accept obligations (in the form of required credit retirements) along with the associated responsibilities of an obligated party. As an extension of this approach, VGS suggests that DDAs should be subject to the same penalty for non-compliance and that obligated parties who contract with the DDA should not be liable for credits they pay the DDA to generate. VGS contends that a DDA will need to share its expected and actual credit generation activities, along with how many credits will be met by installed measures, supplied measures, or banked credits.

Thomas Weiss points to three channels of information flow in the potential Clean Heat Standard system: credit tracking, records and information sharing, and budget building. For records and information sharing, Weiss contends that a DDA would need to keep and share records of all measures it provides on behalf of each obligated party with both the obligated party and the administrator of the credit tracking system. Weiss recommends that obligated parties not be penalized for underperformance by a DDA.

The Department argues that DDAs should be required to share any non-confidential cost and planning data to allow obligated parties to anticipate credit scarcity and plan their own actions accordingly. This would allow for obligated parties to understand their annual requirements and pathways to satisfying those requirements and also allow for the DDA(s) to get a good idea of how many credits they will be expected to fulfill. Relatedly, the Department believes a DDA would effectively take the place of an obligated party after the obligated party pays the DDA the per-credit fee. The Department suggests that DDA performance can be incentivized through established, performance-based contracting structures. The Department suggests that the failure of a DDA to deliver credits it has been paid for by an obligated party would not result in a financial penalty to the obligated party but would be rolled over into that obligated party's requirement in following years.

Decision

As discussed in the section addressing the number of DDA(s), the Commission intends to supervise the DDA(s) using a performance-based regulatory framework. This is notably different from the Commission's more limited authority to regulate obligated parties under 30 V.S.A. § 8124(b) and (f). Some commenters suggest that DDA(s) should be subject to the same non-performance consequences as obligated parties. Given the differences between the regulatory framework to be applied to DDA(s) and to obligated parties, the Commission intends DDA(s) to be treated differently than obligated parties in the potential Clean Heat Standard system.

Commenters identified the rules for the transfer of retirement requirements (*i.e.*, obligations) as an important aspect of how DDA(s) would function. The Commission interprets 30 V.S.A § 8125(a) to mean that the payment of the per-credit fee to a DDA satisfies the obligated party's obligation for that year, with the DDA then operating within a performance-based framework to obtain the required credits for the obligated party. This arrangement does not make the DDA an obligated party itself. As described above, DDA(s) would be regulated differently than obligated parties and would have their own set of responsibilities and repercussions related to performance on behalf of obligated parties. The extent to which a DDA

does not obtain the necessary credits on behalf of the obligated parties would inform the appropriate regulatory outcomes under the performance-based regulation of that DDA.

To complete the budget-building process outlined in 30 V.S.A. § 8125(e), DDA(s) will likely have to file significant amounts of detailed information with the Commission. Commenters identified the information generated by the DDA(s) as potentially valuable for obligated parties to anticipate credit scarcity and useful for outside groups to monitor the progress of the potential Clean Heat Standard program. The Commission agrees with these perspectives and intends to require a high level of transparency and detail pertaining to the work of the DDA(s). The precise information and the manner in which it would be shared will be determined in later orders.

The Commission intends for DDA(s) to be unique participants in the potential Clean Heat Standard system. Subsequent phases of this proceeding will address the details of how DDA(s) will be regulated, how DDA(s) will perform their responsibilities upon receipt of an annual obligation from an obligated party, and the level of information DDA(s) will be required to publish in their filings with the Commission.

IV. Conclusion

The Commission will appoint a small number of DDA(s) to play an administrative role in the potential Clean Heat Standard system. The appointed DDA(s) would be required to serve the entire state, either on their own or through other arrangements, and may compete in some functional areas. The DDA(s) would be treated differently than obligated parties because DDA(s) would be subject to a performance-based regulatory framework and required to share detailed information about their work.

So Ordered.

Dated at Montpelier, Vermont, this 26th day of April, 2024.

Edward McNamara	)	PUBLIC UTILITY
Margaret Cheney	)	COMMISSION
J. Riley Allen	)	OF VERMONT

OFFICE OF THE CLERK

Filed: April 26, 2024

Attest: ______________________
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

PUC Case No. 23-2221-INV - SERVICE LIST

Ashley Adams, *pro se*
544 S PROSPECT ST
Burlington, VT 05401
ashleyjaneadams@gmail.com

Ray Albrecht, P.E., *pro se*
National Biodiesel Board
rayalbrechtpe@gmail.com

Isaac Bissell, *pro se*
isaacwbissell@gmail.com

Stuart Blood, *pro se*
851 Poor Farm Road
Thetford Center, VT 05075
ssblood@riseup.net

Catherine Bock, *pro se*
175 A North Prospect St.
Burlington, VT 05401
tinki.bock@gmail.com

Mary Bouchard
Vermont Gas Systems, Inc.
85 Swift Street
South Burlington, VT 05403
mbouchard@vermontgas.com
(for Vermont Gas Systems, Inc.)

Sarah Braese
Vermont Public Power Supply Authority
PO Box 126
5195 Waterbury-Stowe Road
Waterbury Center, VT 05677
sbraese@vppsa.com
(for Vermont Public Power Supply Authority)

Victoria J. Brown, Esq.
Vermont Electric Cooperative, Inc.
42 Wescom Road
Johnson, VT 05656
vbrown@vermontelectric.coop
(for Vermont Electric Cooperative Inc.)

Carolyn Campion
The Valero Companies
One Valero Way
San Antonio, TX 78249
Carolyn.Campion@valero.com
(for The Valero Companies)

Renee Carpenter, *pro se*
1085 Coburn Road
Apt. #1
Plainfield, VT 05667
reneehc6@myfairpoint.net

William Coster
Vermont Agency of Natural Resources
1 National Life Drive
Davis 2
Montpelier, VT 05620
billy.coster@vermont.gov
(for Vermont Agency of Natural Resources)

Matt Cota, *pro se*
matt@meadowhillvt.com

Heather D'Arcy
Vermont Public Power Supply Authority
PO Box 126
Waterbury Center, VT 05677
hdarcy@vppsa.com
(for Vermont Public Power Supply Authority)

Connor Daley
Vermont Public Power Supply Authority
PO Box 126
Waterbury Center, VT 05677
cdaley@vppsa.com
(for Vermont Public Power Supply Authority)

Alex DePillis
Agency of Agriculture Food & Markets
116 State Street
Drawer 20
Montpelier, VT 05620-2901
Alex.DePillis@vermont.gov
(for Vermont Agency of Agriculture, Food and Markets)

Alison Despathy, *pro se*
alison.despathy@gmail.com

Joshua Diamond
Dinse
209 Battery Street
Burlington, VT 05401
jdiamond@dinse.com
(for Vermont Fuel Dealers Association)

Joshua Diamond
Dinse
209 Battery Street
Burlington, VT 05401
jdiamond@dinse.com
(for Heating and Cooling Contractors of Vermont)

Steve Dodge
Clean Fuels Alliance America
sdodge@cleanfuels.org
(for Clean Fuels Alliance America)

Greg Doremus
gregoryhdoremus@gmail.com

James Dumont
PO Box 229
Bristol, VT 05443
dumont@gmavt.net
(for Law Office of James A. Dumont, Esq. PC)

Laura Edling, *pro se*
81 Carrigan Drive
Burlington, VT
laura.edling@uvm.edu

Brian Evans-Mongeon
Village of Hyde Park Electric Department
P.O. Box 400
Hyde Park, VT 05655
gm@villageofhydepark.com
(for Village of Hyde Park Electric Department)

Steven R Farman
Vermont Public Power Supply Authority
5195 Waterbury-Stowe rd
Waterbury Center, VT 05766
sfarman@vppsa.com
(for Vermont Public Power Supply Authority)

Thomas T. Garden
Triland Partners LP
PO Box 777
44 Indian Rock Road
Windham, NH 03087
tgarden@trilandpartners.com
(for Triland Partners LP)

Geoffrey Gardner, *pro se*
938 Old Post Road
Bradford, VT 05033
Geoffrey323@myfairpoint.net

Joyce George, *pro se*
joyce802@gmail.com

Linda Gray, *pro se*
175 Kerwin Hill Road
Norwich, VT 05055
linda.c.gray@gmail.com

Grace Grundhauser (for Green Mountain Power Corporation)
Green Mountain Power Corporation
163 Acorn Lane
Colchester, VT 05446
grace.grundhauser@greenmountainpower.com

Laura Haight (for Partnership for Policy Integrity)
Partnership for Policy Integrity
lhaight@pfpi.net

Geoffrey Hand, Esq. (for SRH Law PLLC)
SRH Law PLLC
91 College Street
PO Box 545
Burlington, VT 05402
ghand@srhlaw.com

Luce Hillman, *pro se*
University of Vermont
luce.hillman@uvm.edu

Ken Jones, *pro se*
Energy Action Network
kjonesvt5@gmail.com

Marcus Jones (for Living Buildings LLC)
Living Buildings, LLC
PO Box 42
North Bennington, VT 05257
marcus@livingbuildings.co

Michelle Keller, *pro se*
vtkeller@gmavt.net

James Kelly, *pro se*
kellyjfp@gmail.com

William "Casey" Lamont, *pro se*
City of Burlington Electric Department
clamont@burlingtonelectric.com

Michael Lazorchak (for Town of Stowe Electric Department)
Town of Stowe Electric Department
PO Box 190
Stowe, VT 05672
mlazorchak@stoweelectric.com

Donna J. Leban
American Institute of Architects Vermont Chapter
7 Iris Lane
South Burlington, VT 05403
lightspd@comcast.net
(for American Institute Of Architects Vermont Chapter)

Sam Lehr, *pro se*
Coalition for Renewable Natural Gas
sam.lehr@rngcoalition.com

Sam Lehr
Coalition for Renewable Natural Gas
sam.lehr@rngcoalition.com
(for Coalition for Renewable Natural Gas)

Stephen Leslie
Cedar Mountain Farm and Cobb Hill Cheese
hartlandyoga@yahoo.com

Emily Levin, *pro se*
elevin@nescaum.org

John Mandeville, *pro se*
Central Vermont Council on Agencies on Aging
jmandeville@cvcoa.org

Henry Mauck
112 State Street
Montpelier, VT 05620
henry.mauck@vermont.gov
(for Vermont Department of Public Service)

John L. McCormick
Louise Diamond Committee to Protect Next Generations
280 Rounds Road
Bristol, VT 05443
jmccormick@imtd.org
(for Louise Diamond Committee to Protect Next Generations)

Phillip Merrick
134 Dale Rd
Burlington, VT 05408
philsnextone@gmail.com

Johanna Miller
Vermont Natural Resources Council
11 Baldwin Street
Montpelier, VT 05602
jmiller@vnrc.org
(for Vermont Natural Resources Council)

Liz Miller (for Green Mountain Power Corporation)
Green Mountain Power
163 Acorn Lane
Colchester, VT 05446
Liz.Miller@greenmountainpower.com

David Mullett (for ALLEARTH RENEWABLES, INC.)
AllEarth Renewables, Inc.
94 Harvest Lane, Suite 100
Williston, VT 05495
dmullett@allearthrenewables.com

Jen Myers, *pro se*
Champlain Valley Office of Economic Opportunity
jmckaymyers2020@gmail.com

Ken Nolan (for Vermont Public Power Supply Authority)
Vermont Public Power Supply Authority
P.O. Box 126
Waterbury Center, VT 05677
knolan@vppsa.com

Frederick M Parks, *pro se*
PO Box 217
Fairfield, VT 05455
parkstribe@gmail.com

Katherine E Parks, *pro se*
PO Box 217
Fairfield, VT 05455
parkstribe@gmail.com

Jill Pfenning (for Vermont Gas Systems, Inc.)
Vermont Gas Systems, Inc.
85 Swift Street
South Burlington, VT 05403
jpfenning@vermontgas.com

Gregory Pierce, *pro se*
12 Farrar Street
Saint Albans, VT 05478-1540
greg.pierce7@gmail.com

Walter (TJ) Poor (for Vermont Department of Public Service)
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620
tj.poor@vermont.gov

James Porter, Esq.
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620
james.porter@vermont.gov
(for Vermont Department of Public Service)

Pike Porter, *pro se*
544 S Prospect St
Burlington, VT 05401
pikeporter@gmail.com

William Allen Powell
Washington Electric Co-op
P.O. Box 8
East Montpelier, VT 05651
bill.powell@wec.coop
(for Washington Electric Cooperative Inc.)

Jackie Pratt
Town of Stowe Electric Department
PO Box 190
Stowe, VT 05672
jpratt@stoweelectric.com
(for Town of Stowe Electric Department)

Paul J.M. Quackenbush
SRH Law PLLC
PO Box 545
91 College Street
Burlington, VT 05402-0545
pquackenbush@srhlaw.com
(for SRH Law PLLC)

Paul J.M. Quackenbush
SRH Law PLLC
PO Box 545
91 College Street
Burlington, VT 05402-0545
pquackenbush@srhlaw.com
(for SRH Law PLLC)

Andrew N. Raubvogel, Esq.
SRH Law PLLC
91 College Street
P.O. Box 545
Burlington, VT 05402-0545
araubvogel@srhlaw.com
(for SRH Law PLLC)

Emily Roscoe, *pro se*
Efficiency Vermont
eroscoe@veic.org

Paul Rozenberg Suburban Propane PO Box 206 240 Route 10 West Whippany, NJ 07981 PRozenberg@suburbanpropane.com	(for Suburban Propane)
Laura Simon, *pro se* PO Box 1112 Wilder, VT 05088 simonlaura06@gmail.com	
Annette Smith Vermonters for a Clean Environment, Inc. 789 Baker Road Danby, VT 05739 vce@vermontel.net	(for Vermonters for a Clean Environment)
Sriram Srinivasan, *pro se* slsrinivasan@gmail.com	
Christopher Trombly Vermont State Housing Authority christopher.trombly@vsha.org	(for Vermont State Housing Authority)
Michael C. Trunzo Shenker Russo & Clark LLP 121 State Street 4th Floor Albany, NY 12207 michael.trunzo@srclawoffices.com	(for Shenker Russo & Clark LLP)
Michael C. Trunzo Shenker Russo & Clark LLP 121 State Street 4th Floor Albany, NY 12207 michael.trunzo@srclawoffices.com	(for Clean Fuels Alliance America)
Jared Ulmer Vermont Department of Health 108 Cherry Street Burlington, VT 05402 Jared.Ulmer@vermont.gov	(for Vermont Department of Health)

Ryan Vazza (for Global Partners LP)
Global Partners LP
800 South Street, Suite 500
Waltham, MA 02453
ryan.vazza@globalp.com

Floyd V. Vergara, *pro se*
Clean Fuels Alliance America
1415 L Street, Suite 460
Sacramento, CA 95814
vergara.law@gmail.com

Floyd V. Vergara, *pro se*
Clean Fuels Alliance America
1415 L Street, Suite 460
Sacramento, CA 95814
vergara.law@gmail.com

Ben Walsh (for Vermont Public Interest Research Group)
Vermont Public Interest Research Group
bwalsh@vpirg.org

Michael Wang, PhD., *pro se*
Argonne National Laboratory
mwang@anl.gov

Mia Watson, *pro se*
Vermont Housing Finance Agency
164 Saint Paul Street
Burlington, VT 05401
mwatson@vhfa.org

Thomas Weiss
PO Box 512
Montpelier, VT 05601
bandsol@together.net

Victoria M. Westgate, Esq. (for SRH Law PLLC)
SRH Law PLLC
91 College Street
P.O. Box 545
Burlington, VT 05402-0545
vwestgate@srhlaw.com

David C. Westman
Efficiency Vermont - Vermont Energy Investment Corporation
20 Winooski Falls Way
5th Floor
Winooski, VT 05404
dwestman@veic.org
(for Efficiency Vermont - Vermont Energy Investment Corporation)

Frederick Weston, *pro se*
formaine@comcast.net

Chase Whiting, Esq.
Conservation Law Foundation
CLF 15 East State Street, Suite 4
Montpelier, VT 05602
cwhiting@clf.org
(for Conservation Law Foundation)

Amber Widmayer
City of Burlington Electric Department
awidmayer@burlingtonelectric.com
(for City of Burlington Electric Department)

Geoffrey Wilcox, *pro se*
State of Vermont Office of Economic Opportunity
280 State Drive
Waterbury, VT 05671
geoff.wilcox@vermont.gov

Patrick Wood, *pro se*
Ag Methane Advisors LLC
patrick@agmethaneadvisors.com

Brian Woods
Agency of Natural Resources-Climate Action Office
1 National Life Drive
Davis 2
Montpelier, VT 05620-3901
Brian.Woods@vermont.gov
(for Vermont Agency of Natural Resources)

Dylan Zwicky
Leonine Public Affairs
Dylan@leoninepublicaffairs.com
(for Leonine Public Affairs)