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March 1, 2025

via ePUC

Clerk Holly Anderson
Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 24-3460-INV, Public Utility Commission Request for Comments with respect to Thermal Energy Exchange Networks pursuant to Act 142 of 2024 (Case No. 24-3460-INV)

Dear Clerk Anderson:

Thank you for the opportunity to submit comments pursuant to Case No. 24-3460-INV concerning the future of thermal energy networks (TENs) in Vermont. The Public Utility Commission (PUC) is appropriately examining the potential for this approach to clean heating and cooling and Vermonters will benefit from this undertaking.

The Geothermal Exchange Organization (GeoExchange) and the International Ground Source Heat Pump Association (IGSHPA) are national trade associations representing companies and individuals in the geothermal heating and cooling industry. GeoExchange is the industry's public policy arm, focused on the advancement of policies that support the increased deployment of geothermal systems. IGSHPA is dedicated to industry workforce development and focuses on training, standards, certification, and research.

TENs deployed at scale have the potential to lower energy costs for consumers, stabilize the electric grid by lowering peak demands, and reduce emissions. GeoExchange and IGSHPA urge the PUC to approve utility ownership of TENs. The ability for regulated utilities to serve their customers with TENs is essential for adequately scaling geothermal heating and cooling technology and delivering the associated benefits to customers, the community, and the environment. Additionally, utilities should be permitted to spread the costs of TENs deployment and operation across their rate base in an equitable fashion.

Utility ownership of TENs is a growing trend across the United States. We applaud the progress being made in Vermont on this important subject and would be pleased to participate in future dialogues.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Dougherty".

Ryan Dougherty
Executive Director
Geothermal Exchange Association

A handwritten signature in black ink, appearing to read "Jeff Hammond".

Jeff Hammond
Executive Director
International Ground Source Heat Pump Association