

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Investigation of the standard-offer contract)
between Vermont Renewable Gas, LLC and the)
Standard Offer Facilitator) Case No. 24-3359-INV
)
)

**THE VERMONT AGENCY OF AGRICULTURE, FOOD
AND MARKETS’ COMMENTS IN RESPONSE TO THE COMMISSION’S PROPOSAL
FOR DECISION**

The Vermont Agency of Agriculture, Food and Markets (AAFM), by and through counsel, provides the following comments in this matter pursuant to 30 V.S.A. § 248(a)(4)(F)(ii).

AAFM agrees that methane derived from an agricultural operation – e.g. “cow power” – is a renewable source of energy, and acknowledges its benefits, as described in the Proposal For Decision. In addition to those described benefits, including avoiding “negative outcome[s],” AAFM respectfully clarifies that methane derived from an agricultural operation is a renewable source of energy in both legal definition and practice. The statutory framework specifically identifies anaerobic digestion of agricultural products, byproducts, and wastes as renewable energy: “methane gas and other flammable gases produced by the . . . anaerobic digestion of agricultural products, byproducts, or wastes . . . shall be considered renewable energy resources . . .” (30 V.S.A. § 8002(21)(A)).

AAFM appreciates the described co-benefits of utilizing methane from agricultural products, but notes that gasses produced from *inter alia* cow manure are also a renewable source of energy. One example of how manure is a source of renewable energy can be understood through examination of the statutory definition where ‘something’ is renewable if the: “energy

Vermont Agency of Agriculture, Food and Markets' Response to Proposal For Decision
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[is] produced using a technology that relies on a resource that is being consumed at a harvest rate at or below its natural regeneration rate." (30 V.S.A. § 8002(21))¹.

AAFM also appreciates the Hearing Officer's description of the many ways farms may produce wood byproducts as part of their farming activities or agricultural operation, including by growing and harvesting fiber. AAFM contends that the range of potentially eligible activities should remain broad, as the factual contours of specific farming activities determine eligibility.

Finally, AAFM understands Petitioner is interested in amending its Petition to meet all recommended conditions in the Proposal For Decision. This is a novel proposal that could create significant benefits for farmers and rural communities, and help preserve working lands. AAFM is amenable to working with Petitioner, the Commission, and other Parties to further explore Petitioner's ability to meet whatever requirements the Commission establishes.

Dated at Montpelier, Vermont this 23rd of June 2025.

By: */s/ WillyJane Patry*

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¹ Cattle (*Bos taurus*) were domesticated more than 10,000 years ago and the ongoing nutrient cycle of growing crops to feed cattle, and then using cattle manure to fertilize crops, represents an 'original' example of sustainable resource management at or below its natural regeneration rate: generation after generation of cows exemplifies the resource sustainability of cattle and cow manure as a renewable energy source.
(<https://pmc.ncbi.nlm.nih.gov/articles/PMC6304694/>).