

**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 NATURAL RESOURCES’S COMMENTS ON
PROPOSAL FOR DECISION**

The Vermont Agency of Natural Resources (“Agency”) provides the following comments on the Proposal for Decision dated June 9, 2025, in this matter.

The Proposal for Decision recognizes that an electric generation facility which utilizes woody biomass as feedstock could benefit working lands.¹ The Agency agrees. Working lands and rural economies in Vermont have been adversely impacted by the loss of markets for low-grade wood products due to the closure of pulp mills and woody biomass plants in our region. Sufficient forest land exists within a 25-mile radius of Lyndon, including forest on land classified as “agricultural land” under Vermont’s Use Value Appraisal Program, to supply the volume of woody biomass to meet the feedstock needs of a facility such as that proposed by VRG.

Dated June 23, 2025, at Waterbury, Vermont.

Respectfully submitted,
Vermont Agency of Natural Resources



By: _____
Donald J. Einhorn, Esq.
Office of General Counsel

¹ Proposal for Decision at 18-19 (referencing AAFM Brief).