Comment of the RFP.

Given that BED is requesting to postpone if 2026 IRP, which would include a cost-benefit analysis of all energy resources should the MOU between BED and DPS in the 2023 IRP case be approved, given that since theMOU was drafted, McNeil is no longer eligible for CT RECs, it is important that this audit include a cost-benefit analysis of McNeil and other resources with a thorough review of alternatives.

At the December 10, 2025 BED Commission meeting, in response to a customer comment that BED look at cost effective and cleaner alternatives to McNeil, Mr Springer advised that Vermont state “law is trying to get every utility 100% renewable, so we’re not talking about nuclear or natural gas” (https://www.youtube.com/watch?v=CV6d43ZhOZY). The statement misrepresents the Vermont law in an attempt to mislead BED Commissioners about the availability of alternatives. The Renewable Energy Standard reads:

> Tier I requires that Vermont electric distribution utilities procure a defined percentage of their annual load from renewable energy. In 2025, a minimum of 63% of a utility's energy supply must consist of renewable energy. This amount increases each year until reaching 100% in 2030 for all utilities, except for GF Power (Global Foundries' utility) and the municipal electric utilities, for which the requirement reaches 100% in 2035. To satisfy this requirement, **a utility may use tradeable renewable energy credits generated by any renewable energy plant whose energy is capable of delivery in New England.** (https://puc.vermont.gov/electric/renewable-energy-standard emphasis added)

BED management is well aware of the availability of RECs to meet its renewable energy requirements, but failed disclose the alternative of entering into a PPA for none renewable energy and RECs as a cleaner and cost effective to McNeil.

It is clear that BED is unable or unwilling to perform an accurate cost-benefit analysis of McNeil and alternatives. I ask that an analysis be included in the RFP.