

*Living buildings*  
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August 4, 2023

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

Re: Case No. 23-2220-RULE and Case No 23-2221-INV.

Dear Mrs. Anderson:

I, Marcus Jones, am filling the below comments on behalf of *Living buildings, LLC* (LB), an organization working towards a future where the built environment meets our basic needs.

My relevant experience stems from serving rate payers as an energy consultant under the Efficiency Vermont contract; where I worked with customers, distribution utilities (primarily Green Mountain Power) and Vermont Electric Power Company (VELCO) to implement projects and innovative strategies outlined below:

- Oversaw several successful deep energy retrofits with the goal of reducing total energy use by 50% or more. Customers successfully served in the program ranged from a day care facility, K-8 elementary school, restaurant, teen center, library and church.
- Co-founded the flexible load management movement in Vermont, through the 2018 proof-of-concept of flexible load management sequences at the Brattleboro Retreat which led to the subsequent partnership between GMP and EVT to development and implement GMP's Flexible Load Management pilots 1.0 and 2.0.
- Was the thought leader behind innovative projects such as:
  - Electrified heating solutions paired with thermal energy storage (TES) at Burr and Burton Academy and the Woodstock Emergency Management Services building to provide flexible heating solutions.
  - The inclusion of a geothermal system to provide compressor-less cooling of VELCO's New Haven data center.

As the founder of LB, I oversee research, design and implementation of appropriate technological solutions to harness the sun's energy, using the least number of resources to implement and maintain, while providing for the greatest generational impact. Core to our mission is bringing solutions to market that create healthy, affordable housing solutions for the workforce.

Current initiatives include:

- Design and commissioning of electrified residential heating systems with integrated TES.
- Programming and commissioning of TES that provide dynamic and daily load shifting.
- Conceptual design, and eventual construction of, a proof-of-concept residence without mechanical cooling or heating systems using local, earth and reclaimed materials.
- Oversee workforce development efforts through the *Living buildings'* internship/apprenticeship where knowledge is shared about the built environment, its current dependencies and available solutions.

**Case No. 23-2220-RULE.**

*1. We solicit feedback on the efficiency and transparency of using this proceeding to centralize information related to the potential Clean Heat Standard.*

LB agrees that creation of a process focused on transparency and centralized information collection and sharing will benefit the process. A standardized means of collecting relevant customer/partner information would help to streamline the implementation of the Clean Heat Standard.

*2. We seek input on which individuals and organizations should be contacted as part of our effort to recruit members for the Equity Advisory Group and the Technical Advisory Group.*

LB seeks to participate in both groups.

**Technical Advisory Group:** Based on the experience and projects outlined above, we can provide value to the process from our in-the-field experience.

**Equity Advisory Group:** Because our internship/apprenticeship program is focused on working with younger generations, it provides a unique opportunity for their voices to be included in the process. Inevitably, the regulatory and technical aspects of the Clean Heat Standard will be handed to them to implement and maintain.

**Case No. 23-2221-INV**

*1. We also request comments on whether we should follow any contested-case-like procedures for this proceeding.*


Observations of the current Energy Efficiency Utility contested-case process leads us to recommend a system based on collaboration and agreement be implemented. A contested case proceeding inherently results in financial, time, and energy resources; being invested in a process that doesn't provide direct benefits to ratepayers, while creating division among parties. We have a common goal of leaving a habitable planet for future generations. It is highly important to ensure all resources are used efficiently towards that end.

A well-designed process would take into consideration all stakeholder input and define appropriate technological solutions that benefit Vermont ratepayers and interested parties.

In addition, it is recommended to implement performance based verification and commissioning of installed measures over a modeled-savings approach.

If you have any questions, please contact me at 802-338-1438 or [marcus@livingbuildings.co](mailto:marcus@livingbuildings.co)

Respectfully,



Marcus Jones  
Founder  
*Living buildings*