

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 23-2220-RULE

Proceeding to design the potential Clean Heat Standard	
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Order entered: 12/12/2023

ORDER ADDRESSING EARLY ACTION CREDITS

I. INTRODUCTION

On June 30, 2023, the Vermont Public Utility Commission (“Commission”) issued an Order opening this rulemaking proceeding to design the potential Clean Heat Standard. In response to a request for clarity on what documentation and other record keeping would be required to substantiate early action credits pursuant to 30 V.S.A. § 8124(c), the Commission requested comments from stakeholders and members of the public on this topic on September 18, 2023.¹ In today’s Order, the Commission establishes preliminary documentation and record-keeping practices for potential early action credit claims. This Order should guide clean heat measure providers in documenting their work related to the installation and delivery of clean heat measures that have been ongoing since January 1, 2023, and up until the potential implementation of the Clean Heat Standard.

II. PARTICIPANT COMMENTS

The Commission received 11 comments and 11 reply comments giving feedback on early action credit documentation requirements.

General

The Conservation Law Foundation (“CLF”) states that any guidance should be clearly marked with a disclaimer that revisions are likely following analytical work that will form the basis for the program---such as lifecycle emissions, carbon-intensity values, and credit ownership. Thomas Weiss, the Department of Public Service (“Department”), Vermont Gas

¹ 30 V.S.A. § 8124(c): “Early action credits. Beginning on January 1, 2023, clean heat measures that are installed and provide emission reductions are creditable. Upon the establishment of the clean heat credit system, entities may register credits for actions taken starting in 2023.”

Systems, Inc. (“VGS”), and Vermont Electric Cooperative Inc. (“VEC”) each commented on what measures should be considered potentially eligible for early action credits – with Mr. Weiss and the Department supporting just those that are explicitly listed in 30 V.S.A. § 8127(d), and VGS and VEC seeking regulatory certainty of what constitutes an early action measure.

Vermont Public Power Supply Authority (“VPPSA”) opined that establishing guidance on early action credits is premature and may set an inappropriate precedent. VGS, the Vermont Fuel Dealers Association (“VFDA”), and the Heating and Cooling Contractors of Vermont (“HCCV”) all raised the importance of customer privacy. VPPSA, Efficiency Vermont, and the Town of Stowe Electric Department (“Stowe Electric”) all agreed that the Technical Advisory Group should be formed expeditiously and provide clarification on the scope of documentation needed.²

Comments Addressing Recordkeeping and Documentation for Early Action Credits

The VFDA, HCCV, and Clean Fuels Alliance America all suggest that the statutorily required information alone should be sufficient to document early action activities.³ These participants also suggest what records should serve to substantiate this information –invoices, work orders, delivery tickets, and customer self-attestations for income level.

The Department suggests a detailed list of information to substantiate all early action measures. The Department acknowledges that the Commission may expand or narrow what is required based on future recommendations by the Technical Advisory Group. The Department also recommends that notice be provided to customers who undertake clean heat measures that their information may be shared with the Department and its contractors for evaluation and verification purposes. The City of Burlington Electric Department and Green Mountain Power Corporation agree with the Department’s recommendations.

The Agency of Natural Resources (“ANR”) provided its own list of information and documentation to require for clean heat measure verification. ANR contends that there should be no difference in the information collected to verify either an early action credit or a credit within

² 30 V.S.A. § 8128(a).

³ Act 18 provides a specific list of information required for general credit registration: “the location of the clean heat measure, whether the customer or tenant has a low or moderate income, the type of property where the clean heat measure was installed or sold, the type of clean heat measure, and any other information as required by the Commission.” 30 V.S.A. § 8127(l)(2).

the implementation period of the program. ANR's list includes items that would inform its data tracking and analysis efforts related to measuring and tracking progress on climate action and the greenhouse gas emissions inventory.

Efficiency Vermont recommends that the current documentation and recordkeeping requirements for verification of the energy efficiency utility ("EEU") and Renewable Energy Standard Tier III programs be used for early action credits.

Stowe Electric recommends a tracking and reporting protocol that matches the system in place for Efficiency Vermont and the Vermont electric distribution utilities for heat pump measures under a joint rebate program. Stowe Electric also suggests reporting the name of the applicable distribution utility ("DU") jurisdiction in the early action credit program. Stowe Electric contends that this would encourage clean heat measure installers to communicate with the DUs and EEUs to take advantage of existing marketing and outreach campaigns.

Mr. Weiss provided a detailed list of information that would be needed to substantiate a clean heat credit. Mr. Weiss acknowledges that there is substantial overlap among the recommendations as well as some complementary suggestions. Mr. Weiss suggests that certain information may be required for all early action measures whereas other required information may be unique to individual categories of measures.

III. DISCUSSION AND CONCLUSION

General

As more is determined about the design of the potential Clean Heat Standard, and more information is developed through this rulemaking process and the work of the Technical Advisory Group, it may be necessary to revisit and revise the documentation and recordkeeping for early action credits.

We provide the following guidance regarding the information that the Commission recommends entities obtain and retain to claim credits for the delivery or installation of eligible clean heat measures listed in 30 V.S.A. § 8127(d).⁴ Additionally, given the broader definition of

⁴ 30 V.S.A. § 8127(d): "List of eligible measures. Eligible clean heat measures delivered to or installed in residential, commercial, and industrial buildings in Vermont shall include: (1) thermal energy efficiency improvements and weatherization; (2) cold-climate air, ground source, and other heat pumps, including district, network, grid, microgrid, and building geothermal systems; (3) heat pump water

“clean heat measure” in statute and referenced in the text guiding early action credits, the Commission leaves it to the discretion of those engaged in such activities to preserve documentation of potential measures beyond the statutory list.⁵

The Commission adopts customer-privacy-related considerations put forth by several participants. Namely, as mentioned by VGS, the VFDA, and HCCV, all personal customer information should be kept secure by the entity that is collecting the information, as well as their agents and contractors. Additionally, as recommended by the Department, a disclosure notification should be provided to customers who undertake clean heat measures that their information may be shared with the Department and its contractors for evaluation and verification purposes.

Today’s Order expressly *does not* address the topics of credit creation, valuation, or ownership. Those topics will be addressed in the future following additional process and input. In the meantime, because the question of credit ownership remains unresolved, we note that Mr. Weiss proposes a helpful and practical suggestion: that documentation of potential clean heat measures generated by the installer/deliverer should be shared with the property owner and retained by the installer/deliverer.

Documentation of Early Action Credits

The Commission must balance the desire to minimize the administrative burden on providers related to clean heat measures with the fact that the success of this program will depend, in part, on regulators’ ability to accurately verify and account for the savings that result from clean heat measures. Therefore, we intend to be broad in our guidance on documentation

heaters; (4) utility-controlled electric water heaters; (5) solar hot water systems; (6) electric appliances providing thermal end uses; (7) advanced wood heating; (8) noncombustion or renewable energy-based district heating services; (9) the supply of sustainably sourced biofuels; (10) the supply of green hydrogen; (11) the replacement of a manufactured home with a high efficiency manufactured home and weatherization or other efficiency or electrification measures in manufactured homes; and (12) line extensions that connect facilities with thermal loads to the grid.”

⁵ 30 V.S.A. § 8123(3): “‘Clean heat measure’ means fuel delivered and technologies installed to end-use customers in Vermont that reduce greenhouse gas emissions from the thermal sector. Clean heat measures shall not include switching from one fossil fuel use to another fossil fuel use. The Commission may adopt a list of acceptable actions that qualify as clean heat measures.”

and recordkeeping of early action measures to increase the chance that early action measures will generate credits if the Clean Heat Standard program goes into effect.

Given this aim, the Commission has primarily adopted the documentation suggested by the Department, which is the entity responsible for verification of clean heat measures and resulting credits if the Clean Heat Standard goes into effect, and which has decades of experience performing a similar function in the energy efficiency context and for energy transformation projects under the Renewable Energy Standard.⁶ The inclusion of additional documentation is intended to increase specificity, and therefore the likelihood that a potential early action measure will become creditable.

Retaining documentation of the following information does not guarantee eligibility of an action for credit. Even so, we believe collecting as much of this information as is practicable will maximize the likelihood of a measure being awarded credit.

Accordingly, based on the feedback received from stakeholders, we recommend that the following information be obtained and retained to substantiate potential early action measures.

General Information

1. Deliverer/Installer Information
 - a. Deliverer/Installer business name
 - b. Deliverer/Installer contact name
 - c. Deliverer/Installer full business address
 - d. Deliverer/Installer full business email address
 - e. Deliverer/Installer business phone number
2. Recipient Information
 - a. Address where measure delivered/installed**
 - b. Primary contact name (customer and business, if applicable)**
 - c. Primary contact address (if different from installation/delivery address)**
 - d. Primary contact email address**

⁶ Documentation suggested by the Department is in bold text.

- e. **Primary contact phone number**
 - f. **Account type (residential or commercial)**
 - g. Income indicator (self-attestation) – Low⁷ / Moderate⁸ / Neither
3. Clean Heat Measure Information
- a. Date of installation/delivery
 - b. Description of Clean Heat Measure delivered/installed**
 - i. Explanation of the scope of work that may yield Clean Heat Credits**
4. Baseline
- a. Equipment
 - i. Description of baseline equipment/condition**
 1. Make/model (if applicable)
 2. Fuel type (if applicable)
 - 3. Include any relevant equipment efficiencies and data establishing historical fossil fuel use (if applicable)**
 - 4. Whether equipment will be removed or will remain**
 - b. Weatherization
 - i. Energy audit report, initial blower test, if applicable
 - ii. Baseline state of insulation and weatherization in the building(s)
5. Costs / Incentives
- a. Total cost of measure documented through invoices for purchase of any equipment, materials, and installation costs (assuming a physical**

⁷ 30 V.S.A. § 8123(5) “‘Customer with low income’ means a customer with a household income of up to 60 percent of the area or statewide median income, whichever is greater, as published annually by the U.S. Department of Housing and Urban Development or a customer who qualifies for a government-sponsored, low income energy subsidy.” Per 2023 data from the U.S. Department of Housing and Urban Development, Vermont statewide 4-person family median income is \$101,600 (<https://www.housingdata.org/documents/purchase-price-and-rent-affordability.pdf>).

⁸ 30 V.S.A. § 8123(6) “‘Customer with moderate income’ means a customer with a household income between 60 percent and 120 percent of the area or statewide median income, whichever is greater, as published annually by the U.S. Department of Housing and Urban Development.”

measure has been installed at the location). Invoices should include quantities, make/models, and costs.

- b. Indicate cost share for the measure, if applicable (e.g., what the recipient paid, what costs were borne by the installer/deliverer, etc.)**
- c. Incentive program(s), amount(s) and incentive source (e.g., energy efficiency utilities, distribution utilities, Clean Energy Development Fund, or other)**

6. Other

- a. Any other information and supporting documentation that will help an evaluator understand where assumptions came from or other unique aspects of the operations of the measures at the location**

Measure-specific Information



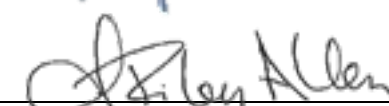
- 7. For heat pumps (all types), water heaters, solar hot water, electrical appliances providing thermal end uses and advanced wood heating, the following should also be provided:**
 - a. Photos of nameplates with model numbers of any equipment being replaced and of any new equipment after it has been installed**
 - b. Inspection notes or certifications provided related to the system**
- 8. For biofuels and green hydrogen deliveries, the following should also be provided:**
 - a. Documentation of ongoing deliveries of biofuels, detailing the dates and amounts (gallons) delivered and the blend provided. In the case of blended biofuels, additional documentation that certifies the actual blend percentage purchased/delivered.**
 - b. If no equipment is being replaced, then photos of nameplates with model numbers of existing equipment should be documented.**
- 9. For line extensions, the following should also be provided:**
 - a. Explanation of the load shape: when the use of the measure will occur throughout the day, week, year to be relatable to ISO-NE and**

Vermont system peaks

b. Description of any electric load shifting, if applicable

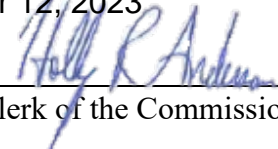
SO ORDERED.

Dated at Montpelier, Vermont, this 12th day of December, 2023.

)	
Anthony Z. Roisman)	PUBLIC UTILITY
)	
)	
Margaret Cheney)	COMMISSION
)	
)	
J. Riley Allen)	OF VERMONT

OFFICE OF THE CLERK

Filed: December 12, 2023

Attest: 

Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

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