

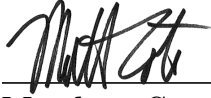
DECLARATION OF MATT COTA.

IN SUPPORT OF THE VERMONT FUEL DEALERS ASSOCIATION'S MOTION TO RECONSIDER THE ORDER ADOPTING AN INTERIM STANDARD CREDIT OWNERSHIP METHODOLOGY

I, Matt Cota, subject to the pains and penalties of perjury, state to the best of my knowledge and belief the following:

1. I, am Matt Cota and reside in South Burlington, Vermont.
2. From 2007 to 2022, I served as the Executive Director of the Vermont Fuel Dealers Association (“VFDA”). Since 2022, I have led VFDA’s regulatory and legislative affairs through the trade association management firm Meadow Hill Consulting. In both these capacities, I have gained extensive knowledge and experience about the regulatory and operational requirements for VFDA’s members, including heating fuel wholesalers and retailers.
3. I currently serve on both the Clean Heat Technical and Equity Advisory Groups. As discussed by both advisory groups, they have assumed that obligated parties will own the clean heat credits attributed to renewable fuels, regardless of whether they make deliveries to customers. Both the Technical and Equity Advisory Groups have suggested that disclosures to consumers about the nature of biofuels being sold by retailers are important to ensure heating equipment compatibility.
4. There is a meaningful distinction between obligated parties and those who merely deliver heating fuel. Obligated parties import the fuel into Vermont. However, some retailers do not import their heating fuel from outside Vermont. They acquire their heating fuel from wholesalers already located within Vermont and, therefore, have no obligation to obtain credits under the Clean Heat Standard.
5. A renewable gallon may have many owners before it is used for heat and hot water. Obligated parties that are not retailers would need to enter into complex contracts or assignment agreements with retailers to obtain ownership of the credits from renewable fuel.
6. Furthermore, this complexity is compounded if the obligated wholesaler that imported the heating fuel into Vermont must be responsible for certification of the heating system.
7. It is estimated that more than 100,000 oil-fired furnaces and boilers are currently in use in Vermont. VFDA members report that some oil furnaces and boilers already utilize 100% biodiesel, and many distribute fuel blends that are greater than 20%.

8. It is not practicably possible for a biodiesel wholesaler to know how the fuel will be blended after it is sold, nor can it know which home the fuel will be sold to or what heating system it will be delivered to. Wholesalers do not provide retail services and cannot know the precise specifications of the furnaces or boilers operating in Vermont buildings.



Matthew Cota

July 30, 2024

Date