

**From:** [Luce Hillman](#)  
**To:** [PUC - Clerk](#)  
**Subject:** Comments regarding the Clean Heat Standard  
**Date:** Wednesday, October 30, 2024 3:41:05 PM  
**Attachments:** [image001.png](#)

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Good afternoon, Please see my comments regarding the Clean Heat Rule draft. Thank you.  
Clean Heat Rule

1. Compliance year is the calendar year. The proposed timeline in the draft rule is as follows:
  - a. Obligated party submits the fuel data for the previous calendar year by June 30 (8.104b)
  - b. Commission determines the number of clean heat credits each obligated party must retire (the first year will be hard- they need to do this in less than 30 days, as Obligated Parties need to develop a plan)
  - c. Obligated party must submit a credit fulfillment plan by August 1 (Section 8.106d) (to cover the previous calendar year sales). This date is too aggressive. Perhaps revise to September 30?
  - d. Under Section 8.114, d1, By June 30, obligated parties must submit the annual compliance filing to meet the previous year's clean heat credit requirement. How is this going to work, at least for the first year? This seems to conflict with the credit fulfillment plan required by August 1 in my comments above.
  - e. Under Section 8.113,d,2: Department must submit a report by August 15. Again, timeline is not realistic as Department receives information by August 1.
  - f. In summary, we need some clarifications on these timelines.
2. Under definitions, 8.103, 29, Qualified Capital Investments, I recommend that upgrading of electrical systems to support the installation of equipment be included.
3. Under Section 8.111, recommend adding another item, 7, to include if the clean heat credit is satisfying the low- or moderate-income requirement. ( and submit the attestation form).
4. Under Section 8.113, a1, "if measure is implemented at no cost". Some of the measures have a rebate but have a shared cost. How should these be handled? Measure attributes cannot be divided so not sure how to deal with this. (3b)

## Companion Status Report

1. Section C, Credit Platform. Does the PUC know the costs of these platforms used in California, Oregon and Canada?
2. Section D, Checkback Report. The checkback report needs to estimate the impacts on customers, as well as greenhouse gas emission reductions. How will the CHS impact school district utility costs ( there are currently very few options to reduce GHG emissions with regards to large systems and boilers), large businesses and manufacturing facilities, the state university system ( a large user again with limited options other than purchasing renewable natural gas), and hospitals. These are the larger users in the state and will impact lower income residents when property taxes increase for the school systems, and health care costs increase even more.
3. The University of Vermont has just increased costs for tuition for next year, is actively pursuing other greenhouse gas emission reductions and developing an Energy Master Plan. However, there are technological limitations regarding options for the large boilers in the Main District Energy Plant(steam distribution) and the aged historic buildings which are very difficult to weatherize. We anticipate that this will change within a few years as technology improves. We have completed two geothermal test wells and are evaluating options for using this technology, which requires a great deal of land and financial investment, as well as a balanced heating and cooling load. We currently heat much more than cool in our system that is served by our Main District Energy Plant.
4. A new thermal energy benefit charge on the sale of fuel oil, propane and kerosene would allow for GHG reductions at much lower administrative costs. This needs further investigation to understand the results of this option.

Thank you.

Luce Hillman  
TAG member  
Clean Heat Standard

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**LUCE HILLMAN, P.E.**

*Special Projects Manager, Facilities Management*

[Facilities Management](#)

University of Vermont

Room 012 – Marsh Hall | Spear Street

Burlington, VT 05405

Office: (802) 656-1079

[Facilities Management Website](#)



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