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To: [PUC - Clerk](#)
Subject: comment on Clean Heat Standard
Date: Wednesday, October 30, 2024 8:55:22 PM

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Hello, The following is my public comment on the Clean Heat Standard, made as a Vermont citizen, not as a state employee which I am. However, it is informed by my 26 years working in the Low Income Vermont Weatherization Program, and living and paying my own way my entire adult life, in Vermont. I am 56 years old.

The CHS, based on what is known now, will be extremely harmful to Vermonters in many ways, especially those who are low income but also moderate and upper income.

Low income impacts: Any increase in fuel costs (which this will create) will be extremely harmful and will cause low income Vermonters to choose between food and fuel. They will likely live in very cold, and unsafe conditions that will harm their health and well being in many ways (much worse than they already deal with now). Low income Vermonters will not be able to purchase heat pumps, Weatherize their homes, drive electric cars, etc. They will continue to try to get by, and it will be significantly more challenging than it already is. This will be the worst thing to happen to them in a long time. Some will die.

Moderate and Upper income: The clean heat standard is assuming that energy efficiency and installation of clean heat measures, etc. will naturally occur if required to. That is so far from what will happen. Energy efficiency programs need to be properly designed to run effectively and it includes training, clear guidance, requirement or expectations, and very evident and consistent quality assurance and quality control. None of this design is occurring. When the work is not done properly, it will cause building failure, indoor air contaminants, health issues for residents, and very poor energy savings, thus low carbon savings. Heat pumps require proper specifying of size, location and client education on proper use in order to work properly and provide the benefits. This does not regularly occur if the contractor is the one designing the install, installing it, inspecting the final inspection and providing all the customer education on how to properly operate. There needs to be involvement of a third party who has no gain on the amount of heat pumps installed. Energy Efficiency programs are very complex and need diligent oversight, and not just at the start. Add the complexity of the Clean Heat Standard, and what you will have is (insert adjective for mass confusion, bedlam, and fraud).

Wood heat. Many low income Vermonters rely on wood heat, especially when fuel prices increase, this includes pellets. Wood and pellet heat is the least expensive source of heat in Vermont and has been for many years. Please do not penalize and villainize Vermonters who want to and need to burn wood. Wood heat will save peoples lives, especially when power outages occur and when oil becomes unaffordable.

As a moderate income Vermonter who lives in a home I built myself in 1997, I have serious concerns on how my wife and I will afford to heat our home. Our home is heated with an oil boiler with hydronic distribution (pipes to baseboard throughout). Changing this system out to a heat pump would be a very expensive measure that I don't have the funds for or ability to take out additional loans for. And my wife and I both work for the state of Vermont in positions that likely pay significantly more than the average moderate income Vermonter and much more than low income Vermonters. If its hard to impossible for us to change out our heating system, how will low income Vermonters do it? They wont.

Please be strong in your report that the CHS would be seriously damaging to the lives of the majority of Vermonters. Thank you.

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