

From: [Barrie Etherington](#)
To: [PUC - Clerk](#)
Subject: Clean Heat Standard comments - Case No. 23-2220-RULE
Date: Thursday, October 31, 2024 10:06:40 AM

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Holly Anderson

Vermont Public Utility Commission

Dear Ms. Anderson,

Below are comments in response to the draft of regulations and should be expectations of the citizen/taxpayers:

1. Determine and Establish the measurement of success in terms of reduction in carbon dioxide levels in the local and national atmosphere. How much and timing.
2. Determine and Establish the measurement of success in reductions to local and national temperature observations. What degree of reduction and by what date?
3. Provide the detailed cost savings and basis for the "cost neutral" Clean Heat Standard. We are told there will be no cost to Vermont citizens and large savings as a result of the CHS. This needs to be agreed to in advance of regulation release. Again, as a measure of success. If we don't have hard targets we can not proceed to spend the taxpayer and rate payer's money.
4. Establish the amount of the Clean Heat Fee that must be paid by on a per-gallon or per BTU basis and when.
5. Test and verify the Clean Heat Fee process has accountability in order to prevent "fraud and market manipulation".
6. Make sure renewable propane is counted as a "sustainably sourced biofuel" just like wood. Include biodiesel and renewable diesel as a "sustainably sourced biofuel".

Sincerely,

Roger Etherington

Pittsford

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