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Comments on DRAFT RULE Case No. 23-2220-RULE  
*by Renée Carpenter*

The PUC has been put into a difficult position by the Vermont Legislature, which failed to listen to thousands of constituents who tried to explain why the Clean Heat Standard will not work for us. It is offensive that our leaders have chosen to attribute our comments to the corporate propaganda of the likes of the Koch Brothers – as if we can't think for ourselves and/or don't understand the economies of our own households. In addition, they fail to acknowledge that the conglomeration of the larger (so-called) environmental organizations in Vermont has been funded by different nation-wide agents<sup>1</sup> who have a vested and financial interest in seeking technological fixes to Vermont's need to limit carbon emissions, decreasing when possible. While the mass media narratives tell us one thing—due to lobbyists' and others' excellent facility with mass media constructions of communication-- those of us who live in the reality of Vermont's heating season, who have history with the impacts of global climate change and public policy on our personal economies, and who are quite able to think for ourselves—we are saying something else.

1- a) The proposed program is too expensive and less efficient than targeting funds that can actually solve specific impediments to cutting carbon emissions. The PUC has taken testimony, including mine, that identifies the "low hanging fruit" towards immediate action towards reduction of carbon emissions.

b)- It is the epitome of inequity to place the burden of state mandated reduction of carbon emissions on Vermont's small fuel dealers.

c) While the Weatherization program works well in most situations, it can be better funded. Because it is administered through the Agency of Human Services (employees of such will speak "diplomatically" at best), there are at least 10% of WX-eligible households that they will not serve due to what I have discovered to be unnecessary bureaucratic impediments.

In addition, households that are just above the level of eligibility but lack resources for desired upgrades—whether it be tightening the physical living unit or shifting to more efficient heating systems—should be recipients of a **state-run and well-funded program** to fill in these gaps.

WX does not replace window or doors. These programs are under-funded and too-often under-staffed.

**I propose that the State should be the "Obligated Party," through the creation of a well-funded Statewide Agency with a specific and direct focus on practical physical methods of statewide carbon reduction.** Subsidized WX programs can continue, as they have been and have this new agency towards which to refer cases & situations their program doesn't address.

## 2. **State-subsidized roof-top Solar and Tesla walls**

a) One look at economic stats reveals that the majority of property owners cannot afford this accommodation towards renewable energy. While I am not opposed to electrification in general, I am also aware that without rooftop solar with battery backup people are left without light and heat when the power grid goes down, which is far too often.

b) it is unfair to compel people to go all-electric unless the state can fund this shift—back-up power & subsidizing the cost to upgrade and service the equipment

<sup>1</sup> Alison Despathy, "Behind Closed Doors," July 7, 2023: (<https://alisondespathy.substack.com/p/behind-closed-doors>)

3. **Regulate Housing Development:** Without sufficient regulation, additional housing takes us in the wrong direction—an immediate increase in carbon emissions multiplied by number of each new building

a) Design to minimize energy usage must be regulated: Materials, depth of insulation, square foot per person, integration into the landscape—including engineering to avoid flood-related damage—etc. Bypassing Act 250 takes us in the wrong direction on all accounts.

b) Add housing units in residential buildings with large footprints

4. Much testimony was given requesting that **bio-fuels and more efficient wood stoves** be taken out of the equation. While I am particularly empathetic to the person who identified that many sources of liquid fuel are destructive to rainforests, this can easily be resolved by requiring locally accessed liquid fuel. If waste fuel is going out of state, there are regulations to make that prohibitive if Vermonters need access to that as a resource. I don't disagree with the testimony offered in this regard, only that we are where we are—and that should be a huge consideration.

Upgrading one's cordwood stove will, in fact, cut carbon emissions. Wood pellet technology is said to be more efficient and less expensive than cord wood: 1-it relies on electricity. When the grid goes down, that heat source is lost; 2- when people age out of lifting those (plastic) 40-pound bags, either efficient cordwood or efficient propane are a practical next step: neither requires electricity and still performs when the power goes out.

We are where we are right now. Please protect the practical rural lifestyles of long-time Vermont residents who rely on our imperfect technologies to stay warm.

5. Similarly, much testimony was also given that points to **Vermont's generally low carbon emissions:** Please take this into consideration before supporting the current highly expensive and overall too-complicated carbon credit based rule-making process that will NOT be just, or effective, or efficient in meeting the carbon-reduction goals, and **will have deleterious impacts on low- and moderate-income Vermonters** while lining the pockets of those who serve to benefit—either financially or professionally or otherwise.

In addition to the already-cited problems with this drive to regulate the increase of high tech "solutions," please also take into account: Solar panels are rich in PFAS and, with their limited lifespans, must be disposed of properly to prevent their leeching into the water table (if that is even possible); carbon implications of the manufacturing process of these "new technologies" are neither factored into carbon emissions calculations, nor is the ecological or social impact of their production in China and other south Pacific and African countries being considered in the current equation. Just because it's not in our face, doesn't mean it should be ignored.

6. And finally, The US military has been the largest producer of carbon emissions, even before their support of increase Zionist aggression throughout the Middle East. I doubt anyone is counting, but we could likely estimate that one week of bombing will generate more than Vermonters generate in a year. Vermont legislators would do more to reduce global carbon emissions by making repeated strong statements to the National administration to that effect; and by considering resolutions to withhold Vermont's share of military aid until government policy shifts towards diplomatic resolutions to conflict.

7. While this may also be out of the purview of the CHS, efficient State Subsidized public transportation that covers essential routes throughout the state so that all communities are served is yet another example of immediate and effective reduction of carbon emissions.

8. **Above all else, the "Obligated Party" should be the state,** not small fuel dealers.

It is past time that policy makers think and act outside of ~~blinded~~ silos to incorporate wider considerations of social and ecological needs alongside the realities of the economics of energy generation, and support efforts to actually reduce consumption.

Many thanks for your efforts.

This is easier to read same comment, in an image.

Many thanks for passing it on

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