

**From:** [C Geddis](#)  
**To:** [PUC - Clerk](#)  
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To Whom It May Concern,

I will start by saying, I fundamentally disagree with any legislation, tax, charge or any monetary proposal that is geared toward CO2 reduction in Vermont. Not one single Vermont legislator has explored where our global CO2 is currently, or historically, statewide vs nationally. They also do not even discuss the elephant in the room, the state of Vermont with its tiny population, is already carbon neutral thanks to our expansive forests, which thousands of Vermonters cherish and are great stewards of. While some alternative energy and conservation would be beneficial in specific areas, largely, many of these overly ambitious ideas do not effectively serve all of Vermont or its residents.

Advocates for the Clean Heat Standard assert that this program will only slightly increase the cost of fossil fuels used for home heating (oil, kerosene, propane, natural gas), that Act 18 is merely a study, and that it will benefit low-income Vermonters by reducing their heating bills. However, these claims are fundamentally inaccurate.

**Cost Implications:** Currently, Vermont imposes a 2-cent excise tax on approximately 200 million gallons of fossil heating fuel consumed annually, generating about \$4 to \$5 million. A proposed 7 to 10 cent fee (regardless of how it's labeled) could yield a maximum of \$20 million per year. However, an analysis by The Cadmus Group—funded by taxpayers—indicates that to meet the 2030 targets set by the Global Warming Solutions Act for the thermal sector, Vermont would need to weatherize 120,000 homes, install over 177,000 heat pumps, and implement numerous other measures by the decade's end. The estimated cost of these efforts is around \$3.3 billion to meet the 2030 goals, with total costs projected at \$9.7 billion. The proposed fee structure will not sufficiently cover these expenses.

Additionally, the administrative costs of establishing and managing the Clean Heat credit market under Act 18 could exceed \$20 million annually, making the idea of a minimal increase in fuel costs unrealistic.

**Not Just a Study:** Act 18 is not a mere study; it is part of the legally binding Global Warming Solutions Act, which requires Vermont to reduce greenhouse gas emissions to 26% below 2005 levels by 2025, 40% below 1990 levels by 2030, and 80% below 1990 levels by 2050. These targets are fixed and non-negotiable. Act 18 was designed to implement the Clean Heat Standard as a means to achieve these objectives for the thermal sector.

While some advocates propose a scaled-back version of the Clean Heat Standard, this would only be feasible if greenhouse gas reduction targets for other sectors, like transportation and agriculture, are simultaneously increased. It is important to note that the legislature has yet to consider reduction plans for these sectors, which are likely to face similar challenges as the Clean Heat Standard.

**Impact on Low-Income Vermonters:** The Clean Heat Standard is regressive and unlikely to benefit low-income households. Proponents claim it will assist low-income Vermonters in transitioning to heat pumps and other alternatives, similar to wealthier residents. However, funding for this transition will come from those purchasing fossil fuels—primarily low- and moderate-income households still reliant on these fuels.

Over 70% of Vermont households utilize fossil fuels for heating, and many low- and moderate-income households reside in properties that are costly and challenging to convert to non-fossil technologies. Consequently, they will face rising fuel costs while they wait for transitions to occur, all compounded by Vermont's insufficient labor force to meet the timelines mandated by the Global Warming Solutions Act.

**Recommendations:** The Public Utilities Commission (PUC) has found that the Clean Heat Standard "does not make sense for Vermont" due to its costs, complexity, potential for fraud, logistical constraints, and regressive impacts. While the PUC has suggested replacing it with an "efficiency charge"—a direct tax on home heating fuels—this would not solve the logistical and labor issues or address the increased heating costs faced by many Vermonters.

Therefore, the most prudent recommendation for the PUC is to refrain from implementing the Clean Heat Standard in 2025, to repeal Act 18, and to amend the Global Warming Solutions Act to set realistic, achievable goals and timelines that are financially viable for Vermonters.

Sincerely,

Colleen A Geddis

Newark Vermont