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Subject: PUC Draft Clean Heat Standard rule - comment
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Good Morning.

I received an email from Gov. Scott's office yesterday reminding me that the public comment period for the Public Utility Commission Draft Rule on the Clean Heat Standard closes today. I was unable to find a copy of the rule, if there is one, on any of the PUC websites. If the draft wasn't completed until sometime in mid-October, that happened to coincide with a surgical event in my life which made me temporarily uninterested in outside developments. Now, I find I have less than 24 hours to analyze a rule I can't find, but which potentially has significant personal implications.

So - here is a comment. This 'public participation' process is deeply flawed. Common sense is buried somewhere deeply down in a labyrinth of bureaucratic complexity. The purpose of the Clean Heat Standard is to accomplish a goal - but - the fundamental goal is wrong.

The goal ought to be to alter the course of a global problem, which it doesn't take much common sense to find cannot be done by one small state operating on its own. Instead, a goal has been set which essentially will cost Vermonters real difficulty and expense, without altering the course of global warming. Vermont cannot afford symbolic gestures of this category. To make the public participation process legitimate, real details about how the CHS would be implemented, its effects on the current fuel oil suppliers, its impact on the limited number of qualified service technicians, the cost of upgrading home electrical systems - indeed, the number of homes which would become worthless because of an inability for one reason or another to add more electrical capacity - should be presented to the public in a clear, non-legalese format with adequate notice and time for response.

Instead, we have a token chance to reply to something we can't understand.

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