

From: [Campaign for Vermont](#)
To: [PUC - Clerk](#)
Subject: Comments on 23-2220-RULE
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Attachments: [CFV Public Comment on CHS 11.1.2024.pdf](#)

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Good Afternoon, please see the attached comments on Rule 23-2220.

Ben Kinsley
Campaign for Vermont

CAMPAIGN FOR VERMONT

CampaignForVermont.org

Dear Public Utility Commission,

As your public comment period on Act 18 ends, we wanted to reiterate the importance of Vermonters knowing what the cost of this potential program will be. As we endeavor to combat the sources of climate change and the associated impacts on the daily lives of Vermonters, we, as citizens of this state, deserve to know what the costs and benefits of the Clean Heat Standard will actually be so that public policy makers can best evaluate how to deploy our limited resources for maximum impact.

We are encouraged to see that your recommendations will include a more transparent and straight-forward tax/fee structure to collect the necessary funds to achieve the carbon-reduction measures targeted by the legislation. We believe this structure will be more accountable with reduced potential for fraud than the credit system. Additionally, it will be more clearly understood by the public and potentially less likely to create monopolies in the energy sector than a credit market would.

While we recognize the immense work that has gone into this process already, we strongly urge you to make sure that all the information, both costs and benefits, are clear in any policy recommendations you put forward for legislative consideration. In fact, the legislation itself requires this, stating that the Commission should “establish the default delivery agent credit cost” every three years starting in 2023.¹ Further, the Vermont Constitution requires that prior to “any law being made to raise a tax, the purpose for which it is to be raised ought to appear evident to the Legislature to be of more service to community than the money would be if not collected.”² In other words, there needs to be a demonstrable net-benefit to society from the legislation. The cost-benefit analysis required in Act 18 is critical to making this assessment and we urge you not to shirk your public duty in providing this information to Vermonters who want to understand what this legislation will end up meaning for them.

On behalf of Vermonters,

Pat McDonald

President, Campaign for Vermont



CFV is a nonprofit, nonpartisan advocacy organization dedicated to the vision of a more prosperous Vermont and a growing middle class.

With a network of over 25,000 people statewide, they seek to accomplish these goals by reconnecting everyday Vermonters to their government and advocating for more transparent policymaking.

¹ See Page 18 of [Act 18 As Enacted](#)

² See Article 9 of the [Vermont Constitution](#)