

From: [Amelang, Bob](#)
To: [PUC - Clerk](#)
Subject: Case No. 23-2220
Date: Friday, November 1, 2024 1:37:13 PM

You don't often get email from bamelang@comcast.net. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

to PUC, re: Clean Heat Standard (CHS):

I strongly support the PUC determination that the Clean Heat Standard is overly complicated and it should not be enacted. I also provide the following comments to the legislature for their consideration in rewriting a new law to limit carbon emissions in the heating sector.

(1) The PUC should not be again tasked with the task of dealing with a bill such as the CHS. That the legislature gave the PUC this task last year is evidence the legislature does not understand the voluminous work the PUC already does. Besides the work load of handling utility rate and construction cases, there are numerous renewable energy generation projects that the PUC must review. Each such case is complicated and time consuming. From working at CVPS/GMP for 26 years, I know first hand about the PUC work load. I also was an expert witness at PUC cases after retiring in 2013, including the Shaftsbury Solar Project filing this year. There will continue to be more and larger solar projects filed at the PUC; they already have too much work to do.

(2) Any replacement to the CHS should be a simple process of providing more subsidies for building weatherization.

(3) The legislature must get more guidance from unbiased energy experts on estimated program costs. This includes assessing the availability of skilled tradesmen to do weatherization work.

(4) The legislature must consider cost impacts on low and middle income Vermonters. The state already has experienced significant cost increases in education and health care cost.

(5) Vermont already has seen a large increase in heat pump installations and the resultant decrease in heating fuel sales. The state does not need to subsidize heat pump installations, except that utilities and Efficiency Vermont could be mandated to continue and/or increase subsidies for new heat pumps.

(6) The state should consider reviving modest programs to reduce wood heating, such as a program that Neighborworks assisted with a few years ago to replace old, inefficient wood stoves with new efficient and less polluting ones. The state should not listen to the many commenters at the October 30 public hearing that spoke about the dangers of burning any biofuel and suggested banning its entirely. Vermont's long tradition of burning wood should not be attacked. Wood heat is still a viable back up heating source for power outages and heating homes in extremely cold periods when heat pumps will not work.

Thank you for the opportunity to comment.

Bob Amelang

Rutland, VT