

From: [Mark N](#)
To: [PUC - Clerk](#)
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Here are my comments concerning the Clean Heat Standard ("CHS") Case No. 23-2220.

- The CHS is overly complicated, has a lack of agreement on emissions accounting, has different models giving different results, has a lack of clarity on costs, and has the potential for fraud as the PUC has pointed out.
- As with the Renewable Energy Standard, the "societal benefits" appear in later years and may be regional and global rather than Vermont specific. While the financial costs to be borne by Vermonters, especially up-front costs, are widely acknowledged to be very high.
- Administrative costs are likely to be enormous.
- The PUC needs to identify each of these types of costs (and benefits) separately and provide clear accounting for each category so that the public and legislators are presented with facts.
- To meet the requirements of the Global Warming Solutions Act, most of the emissions reductions, as modeled, will come from biofuels. Biofuel costs are just as volatile as fossil fuels. Also, recent science shows that biofuels create just as much, if not more, pollution and green house gases as fossil fuels.

Thank you for allowing me to submit these comments. I look forward to your thoughtful response.

Mark Nelson

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The wildlife, wild lands, and wild waters need our voices for their protection.