

# Comments and Recommended Changes

## Draft Regional Energy Plan 2024

### Regional Plan Committee, May 22 Meeting

Discussion of the fact that rail service could be reinstated on any existing rail beds that house rail trails. The benefits and importance of rail trails should be mentioned as a consideration with the expansion of rail.

#### ***NRPC Proposed Change***

Section VI, Goal 4: Increase region-based passenger rail trips and rail freight tonnage in the region.

Strategies:

1. Support bringing Vermonter service to Montreal.
2. Support increased rail freight service to the region on existing active rail lines.

### Board Meeting, May 30<sup>th</sup>

Reductions in public transit should be avoided. Discussions at GMT, VTrans and other neighboring services are ongoing.

#### **NRPC Proposed Changes**

Goal 3 has strategies that support this idea; no specific changes to the plan are needed. For example:

Goal 3, Implementation Step 3: Continue active participation with the Green Mountain Transit Board of Commissioners and support increased levels of public transportation service to the Northwest region.

### June 5<sup>th</sup> Public Meeting in Grand Isle County

No comments received.

### June 13<sup>th</sup> Public Meeting via zoom

No comments received.

## June 18<sup>th</sup> Public Meeting in Franklin County

No comments received.

## June 26<sup>th</sup>- NRPC Board Meeting

Commissioner Britch-Valenta requested the addition of a strategy to help communities apply for grants for resilience projects and programs. Commissioner Britch-Valenta also provided editing suggestions which will be incorporated into the plan.

Commissioner Nance provided follow up comments via email, including several grammatical/editing suggestions which will be incorporated into the plan. Additional comments include:

- Suggested adding “business or businesses” to list of partners in several locations in the plan.
- Page #14 recommends replacing the phrase “amongst others” with “historically marginalized people”
- Page 23- Move GMP graphic to next page as it is confusing without context
- Page 29- Consider adding data on current commercial/industrial energy use
- Page 37- Smart-rate structure could have an impact on equity
- Concern about “missing middle” of those not targeted by incentives
- Concern about potential costs of building increasing with enhanced energy codes.
- Unsure about feasibility of GMT being included in Act 250 applications
- Goal #5, Strategy #5- Is there a way to support commercial industrial sector to convert to more efficient green fuels
- Page 47- Would prefer stronger language around regional constraints

### **NRPC Proposed Changes**

- Add Strategy #2 under Goal 6: Support municipal projects that align with the goals and strategies of this plan.
- Add businesses to list of potential partners.
- Page #14 replace the phrase ‘amongst others’ with ‘historically marginalized people’
- Move GMP graphic to page 24
- Add Strategy #6 to Goal #5 “support state programs to encourage business fleets to convert to electric vehicles”

### **Additional Notes**

- NRPC recommendations for constraints must conform with the recommendations of the rest of the Regional Plan, which limits which constraints may be considered known versus possible.
- NRPC could not include additional data on commercial/industrial energy use as there is no data of useful quality available.
- NRPC did note potential issues with smart rates that may need to be mitigated in the strategies. Additional discussion of this could be included in a further plan update as the issue warrants additional research. NRPC also addressed middle-income households in its challenges and opportunities section.

## June 27<sup>th</sup> Public Hearing at NRPC Offices and via Zoom

Mary Harborough from the St. Albans City Energy Committee had the following comments on the plan:

- Geothermal should be included throughout the plan, mainly as an opportunity for thermal energy. Geothermal uses minimal electricity and works in all climate conditions. Geothermal can be used on the development site, which limits the need for greenfield development of solar and wind. Geothermal should be encouraged both for new buildings and retrofits of existing buildings.
- Consider impacts of climate refugees and sequestration, such as biochar.
- Plan should include language discouraging biomass facilities that do not address air pollution and caution against the dangers of loss of forest biodiversity with excess harvesting of timber.
- Goal 2 #7, support stretch energy codes
- Goal 3, Strategy 4 should include on-street electric vehicle charging, as current incentives do not allow for this
- Goal 5- uneasy with the inclusion of biofuel and CNG as equal to electricity for transportation energy
- Goal #6- Metrics are not always the most important, add a third implementation item “Support municipal energy committees with project planning, management and grant management”
- On page #45, goal #8 Strategy #6, concern that methane biodigesters can leak or be unsafe
- On page #45 Goal #8 Strategy #8 consider adding white hydrogen as a potential future source of energy
- Constraints should consider that minimally constrained sites may be more appropriate for housing than renewable energy
- Page #55 ethanol should be removed from the plan as it requires more energy to produce than it creates
- The energy burden map should note that in the 2023 data, the electrical energy burden for St. Albans City has incorrectly done, and therefore that should be noted

Commissioner Barbara Murphy from Town of Fairfax had the following comments

- On page 12 there is a reference to workforce data from 2015, see if this can be updated
- Clarify whether Standard Offer Program has expired
- On Pg. 17 clarify the comment on margin of error
- Goal #3 Strategy 3 should be changed as not all communities are on a public transit route, and therefore a public transit stop would not always make sense
- Agree that ethanol should be removed from the plan, corn should be used as a food source
- Page #45 determine whether or not standard offer program was extended or not

### **NRPC Proposed Changes**

- **Page #12-** Update workforce data numbers with numbers from the 2022 report
- **Page #39** Add geothermal district heat and waste district heat to forms of district heat encouraged by the plan “District heat may also be generated from geothermal heat systems or waste heat from large institutions and businesses.”

- **P. 42 Implementation #6** Add geothermal to Implementation #6 list of public infrastructure which could be planned via capital planning
- **Edit Goal #2 Strategy 3** to read “for new construction and renovation of existing residential and commercial buildings”
- **Edit Goal #3, Strategy #3**, Require a public transit stop for all residential and large commercial land developments subject to Act 250 if a stop is not currently available *and the development is along an existing or planned fixed route service.*
- **Goal #5-** Increase the share of renewable energy in transportation by increasing the use of *renewable electric vehicles and for heavyweight vehicles*, less carbon-intensive fuels such as biofuels, and compressed natural gas.
- **Goal #5 Strategy 4-** replace biofuels with “biofuels other than ethanol”
- **Goal #6 –** Add strategy #3 “Support municipal energy committees with project and grant management for energy and climate resilience projects that are consistent with this plan.”
- **Page 55** Add language that NRPC does not support the use of ethanol as an alternative fuel “This plan does not support the use of ethanol as an alternative fuel due to the high environmental and energy costs of producing ethanol.”
- **Energy Burden Map:** Added an overlay and note regarding data challenge with St. Albans City data in the 2023 map. Added date of map data.
- **Appendix F:** Add date of data collection, 2020.
- **Remove** references to the Standard Offer program as the state is renovating the renewable system under H. 289

Other comments may be included in future plan updates. For the purposes of this plan. NRPC has followed the model of the state Comprehensive Energy Plan in addressing energy, but not directly addressing non-energy climate goals. The overall Regional Plan does include a section on climate resilience.

## Additional Staff Recommended Changes

### 1. Clarifications and Edits:

- Page 43- Edit implementation action #2 to remove reference to Community Energy Dashboard- recommended replacement “Work with Energy Action Network to provide available data by municipal planning commissions and energy committees to aid municipal energy planning work.”
- Page 47, LEAP Generation Target listed as 208.5 MW, should be 140.1 MW.
- Page 48 and 49, wind generation target listed as 19MW, should be 2 MW.
- Page 49, paragraph 5 “These standards shall be adopted by the board by July 1, 2017” should be changed to “These standards were adopted by the board in July 2017.”
- Add map clarification language related to sources and dates.
- Page 68- Add parking lot canopy solar to the list of solar allowed in designated downtowns, designated growth centers and designated village centers.
- Appendix F- Remove reference to Energy Action Network’s Community Energy Dashboard