



Hello, my name is Peter Sterling and I am the interim Executive Director of Renewable Energy Vermont, the trade association representing Vermont's clean energy industry.

I would like to make three quick points about the Department of Public Service's 2021 Comprehensive Energy Plan.

Additionality, must be the cornerstone of any climate change mitigation policy. Additionality, according to the Kyoto Protocols, means that energy resources must result in "reductions in emissions that are additional to any that would occur in the absence of the certified project activity".

The Comprehensive Energy Plan fails this additionality test both looking forward and backwards.

Looking to the future, the Comprehensive Energy Plan fails to identify and provide specific and actionable steps the State of Vermont can take to achieve a fully decarbonized electric sector and to prepare for the future we know is coming- with increased electric loads driven by vehicle and building electrification.

The Plan merely encourages general load management without identifying any actionable strategies to fully decarbonize Vermont's electric sector and bringing additional clean electricity resources online.

Exacerbating this problem, the Plan states "There is no reasonable argument to effectively exclude existing renewable resources that have served Vermonters for decades, and any revised RES should consider the earlier portfolio requirements and goals that informed utilities' owned resources and long-term contracts."

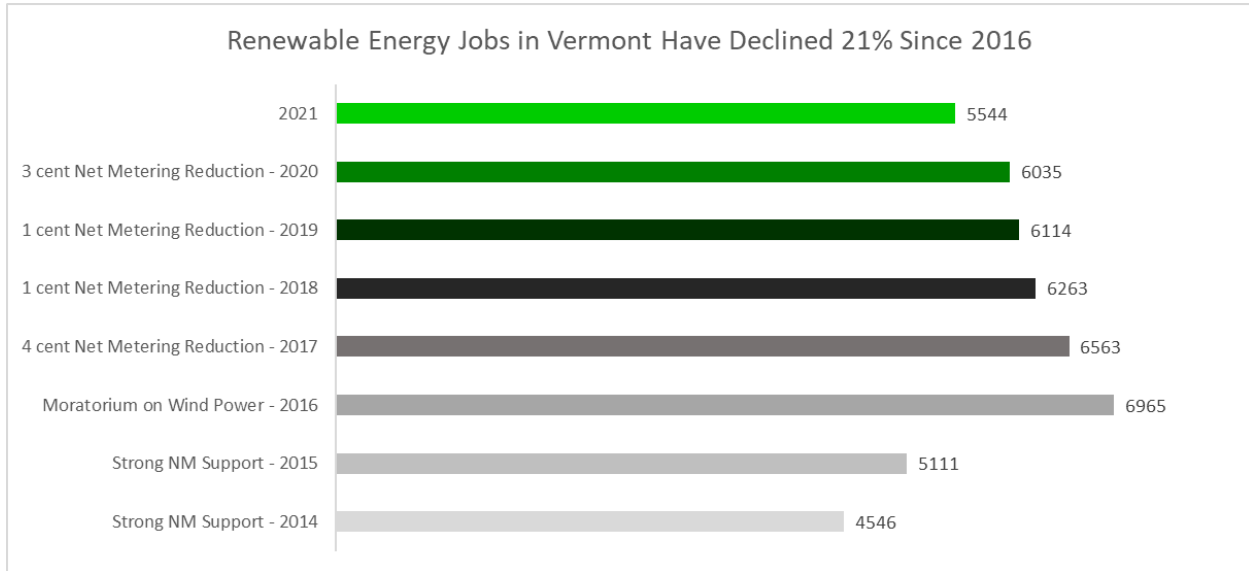
Or put another way, the Department of Public Service apparently believes that instead of bringing on line new renewable energy sources to solve the climate crisis, an acceptable solution is allowing utilities to be given credit for renewables built decades ago and allowing these already existing energy sources to be counted towards meeting future clean energy goals under the RES.

Second, I would like to point out the Plan misrepresents of the scale of the recent loss of clean energy jobs in Vermont.

The Plan cites figures from the annual Clean Energy Industry Report prepared by the Department of Public Service that the number of clean energy jobs increased by 18% between 2014 to 2021.

The Plan glosses over the fact that, according to this same report, employment in the clean energy industry has decreased by 1,579 jobs since the industry's high watermark in 2017 when 19,081 Vermonters were employed across the sector *despite* the ever increasing need for Vermont to transition faster off of fossil fuels to avert climate crisis.

This chart looks at the impact of the loss of net metering supports and resulting the job loss just within the renewable energy sector within the clean energy industry. You can see that the sector that only four years ago employed almost 7,000 Vermonters now employs roughly 5,500 people, a 21% decrease.



REV does not agree with the Plan’s statement that “Under any reasonable measure, the existing siting process allows well-sited generation projects to be built in Vermont.”

REV members have long documented how the existing siting process is unpredictable and unnecessarily time consuming adding extra costs and uncertainty to the construction of solar projects for all but the smallest size projects. Serious reform of the siting process for solar projects is necessary if Vermont is going to meet its goals for in-state renewable energy procurement.

Let me cite a recent ruling demonstrating that the existing siting process is anything but “reasonable”.

MHG Solar sought a CPG to build a 500kW project on Richville Road in Manchester. Contrary to the Department of Public Service’s own aesthetic expert who concluded the project would not have an undue adverse effect on aesthetics, the PUC’s hearing officer states in his report that quote The Project would have an undue adverse impact on aesthetics because the Project would be out of character with its surroundings and would significantly diminish the scenic qualities of the area such that it would offend the sensibilities of an average person. End quote

His report states that the duration of the view for drivers [on Richville Road] would be approximately 26 seconds and that approximately ten residences or businesses near or

adjacent to the Project site would have visibility of the Project though the report does not provide a citation for this last claim.

If we are trying to fight the climate crisis and reduce our use of fossil fuels but our state regulators aren't willing to ask people to potentially look at solar panels for 26 seconds as they drive by, then we clearly need a wholesale rethinking of our permitting process for renewable energy projects.

Thank you for your time this morning.