Renewable Energy Standard Reform Legislative Working Group Member Opinion Survey, October 13 - 18, 2025

Legislative Working Group Members request input on the following questions relating to potential policy changes. Your input will be used to help focus discussion at the RESRWG meetings on October 25th and November 1st. Results will be shared in aggregate form, shared with all working group members, and posted to the legislative working group website on or before October 20th. This survey is not anonymous; you are requested to enter your name and organization. Thank you.

Please enter your name and organization.

17 responses

Darren Springer, Burlington Electric

Christopher Pearson, Sierra Club

Ken Nolan, VPPSA

peter sterling renewable energy vermont

Mia Watson, Vermont Housing Finance Agency

Chase Whiting, Conservation Law Foundation

Brian Shupe, VNRC

Mia Watson, Vermont Housing Finance Agency

Anne Watson, VT Senate

Please enter your name and organization.

17 responses

Shana Louiselle, VELCO

Jeffrey Cram - GlobalFoundries

William Driscoll, Associated Industries of Vermont

Louis Porter Washington Electric Cooperative

Rebecca Towne Vermont Electric Cooperative

Brian Evans-Mongeon, Hyde Park Electric Department

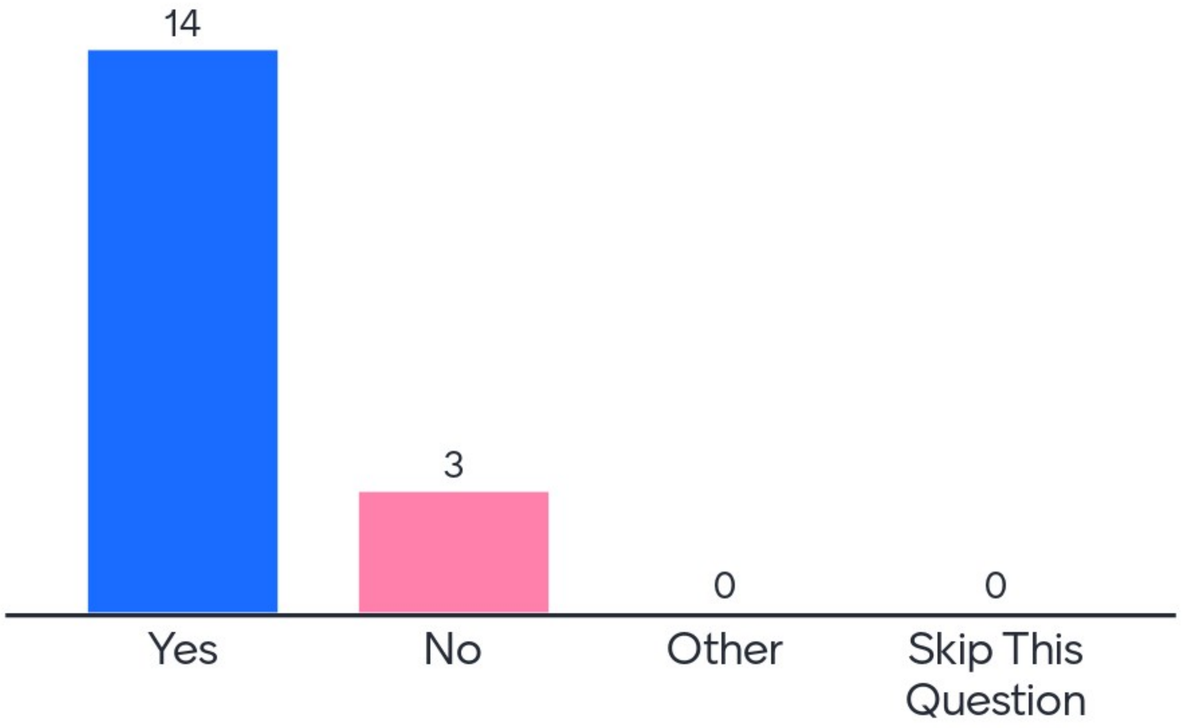
Candace Morgan, Green Mountain Power

Ben Edgerly Walsh, VPIRG

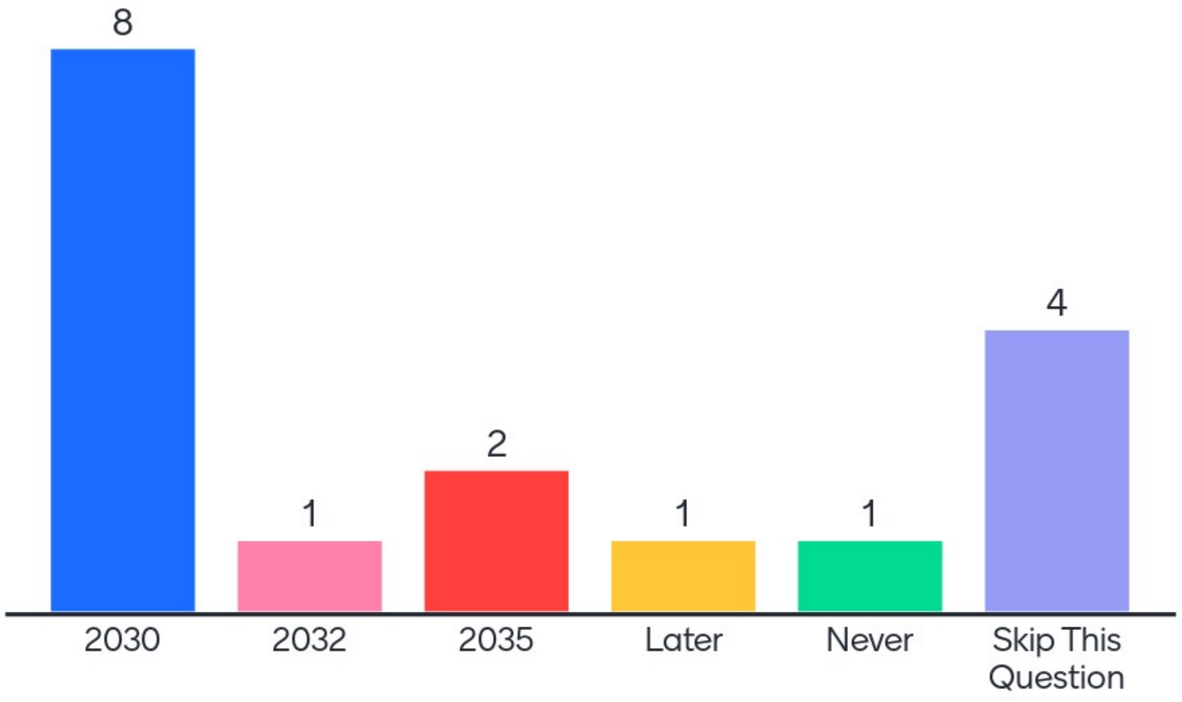
TIER 1: Questions 2 - 11

You may skip any questions that you do not wish to answer, as needed. For open text questions that you dod not wish to answer, enter "N/A"

Should the RES move to 100% total renewable on an annual basis?



If yes, in what year should Vermont move to 100% renewable?



(Optional) What informed your answers to whether / when VT should move to 100% renewable?

16 responses

100% is achievable with flexibility on resource type, size, and location. 100% may not be achievable in a cost-effective way if too many restrictions are placed on resource procurement.

We are so late to address the climate. State policy is to push electrification and that only works if the electricity we depend on is renewable.

Most Vermont's utilities are on a path to 100% renewable and seem to believe it can be done affordably (absent the RES becoming too restrictive). Timing is more a function of transitioning portfolios

three vt utilities are already at 100% renewable. two others, GMP and VEC, have already pledged to do so. this requirement seems entirely realistic

Concern about rate impacts on low income households, as well as the feasibility of accessing new renewables in a short time frame

The climate crisis requires clean, renewable energy sources that are abundant and capable of displacing all carbon-based combustion fuels now used for transportation, heat, and electricity generation

Urgent need to address climate change; opportunity to take advantage of IRA funds; need to build greater resilience.

Balancing need to respond to climate crisis with potential impact on LMI customers, feasibility of finding new renewables

My hope is to reduce greenhouse gasses as much as possible. To that end, I'd like to see us move toward 100% renewable, while allowing time to build new renewable resources.

(Optional) What informed your answers to whether / when VT should move to 100% renewable?

16 responses

Vermont should move to 100% renewable in the year it strikes the balance of clean energy needs, affordability needs, and reliability requirements.

VT should move to a 100% Clean Standard. VT should not take 0 or low-carbon generation sources out of play as new renewables would replace a 0 to low carbon source rather than fossil fuel source.

A simple threshold in the complexity of the electric industry is not possible. For example, 100% for financial application is possible, but 100% on an actual operational basis is not.

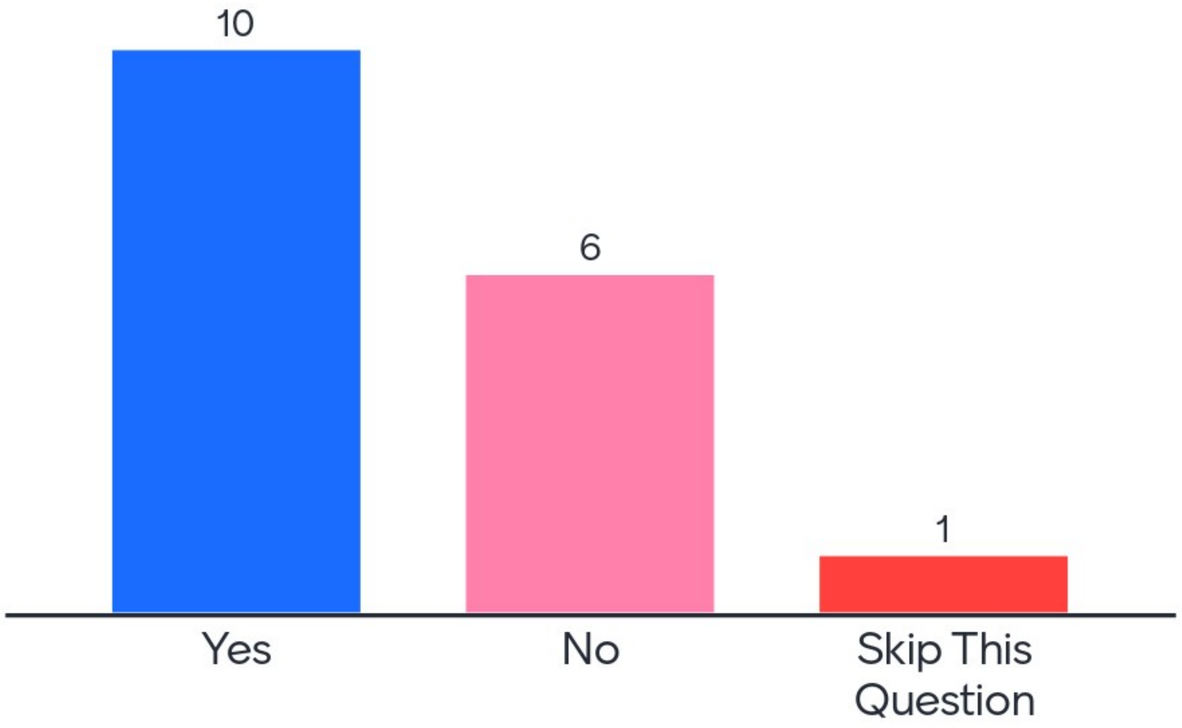
VT has the ability to move to a 100% renewable standard by 2030. This will entail additional costs for ratepayers, it will also reduce VT's current, very small electric sector carbon contribution.

Vermont is largely committed to 100% clean energy, and taking those last steps on an annual basis seem relatively straightforward particularly if we continue to include nuclear which is carbon-free

100% renewable annually aligns with GMP's own goals as set forth in our IRP.

Renewable is too limiting. A 100% clean/minimal GHG portfolio could/should be supportable if negative rate impacts can be avoided. Clean has more flexibility to achieve that than strictly renewable.

Should the current list of Tier 1 eligible resources change?



If yes, what types of resources should be added or removed?

17 responses

N/A, we need all the resources available to meet our ambitious goals

The previous question could not be skipped, otherwise I would have. I answered yes because I think that there is consensus that the list should be revisited, but I am not certain about which resources

New woody biomass electricity generation should not be Tier 1 credit eligible

a new tier with a new requirement for new (post 2010) in-region wind, solar and hydro

N/A

I'd like to see us create a "Tier 1a" requirement of 30% new regional renewables like off-shore wind.

No is contingent on current tier 1 resources being capped at 40%., with no new large scale hydro and no new electricity-led biomass.

The RES should focus on carbon reduction while honoring past investments. Tier 1 should move to a Clean Energy Standard and allow nuclear

N/A

If yes, what types of resources should be added or removed?

17 responses

If climate change is truly an existential threat, as WEC believes it is, we need to make sure that our electrical supply is low carbon and rates are low to encourage beneficial electrification.

Nuclear should be included as a clean-energy option. This respects current nuclear contracts that go beyond 2030 and provides the possibility for new nuclear technology to serve winter needs.

Qualifying resources should be expanded to include clean/minimal GHG emitting rather than just renewable.

N/A

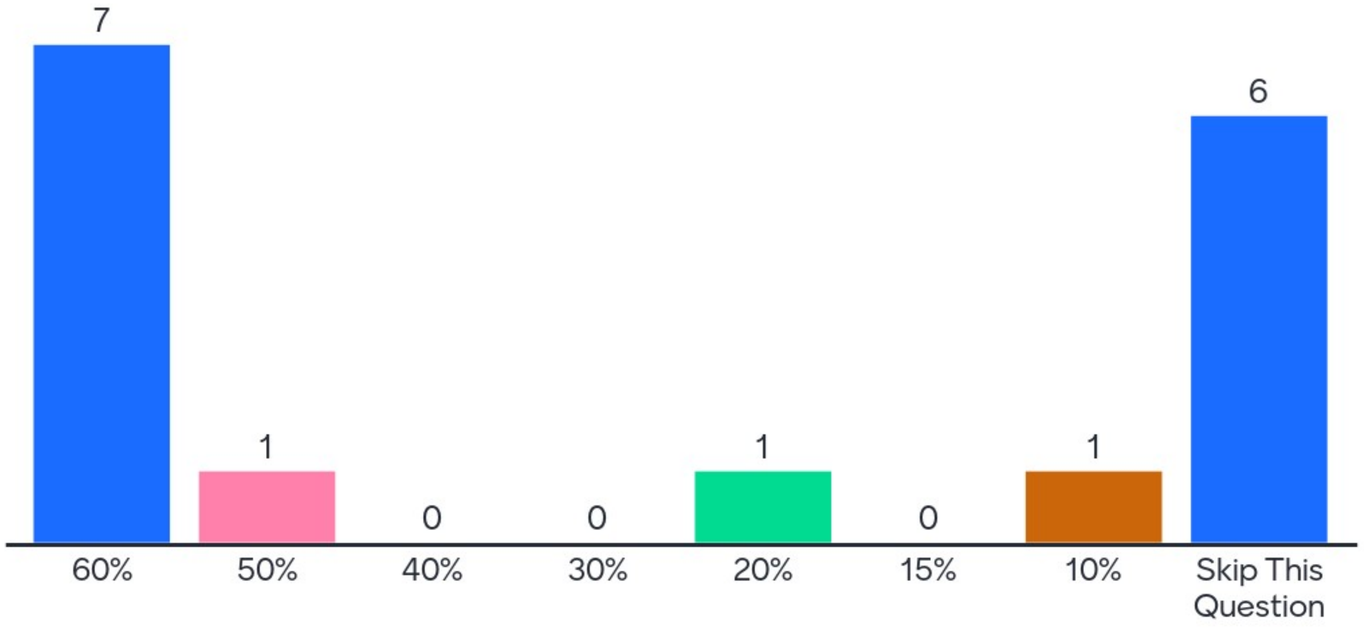
It is time to remove biomass from tier 1, the science is clear and VT's RES should be updated accordingly.

NA

Allow existing and new nuclear technologies.

New biomass should not qualify unless it meets a high efficiency standard. If new renewables requirements are not high enough, unbundled RECs from large hydro should also not qualify.

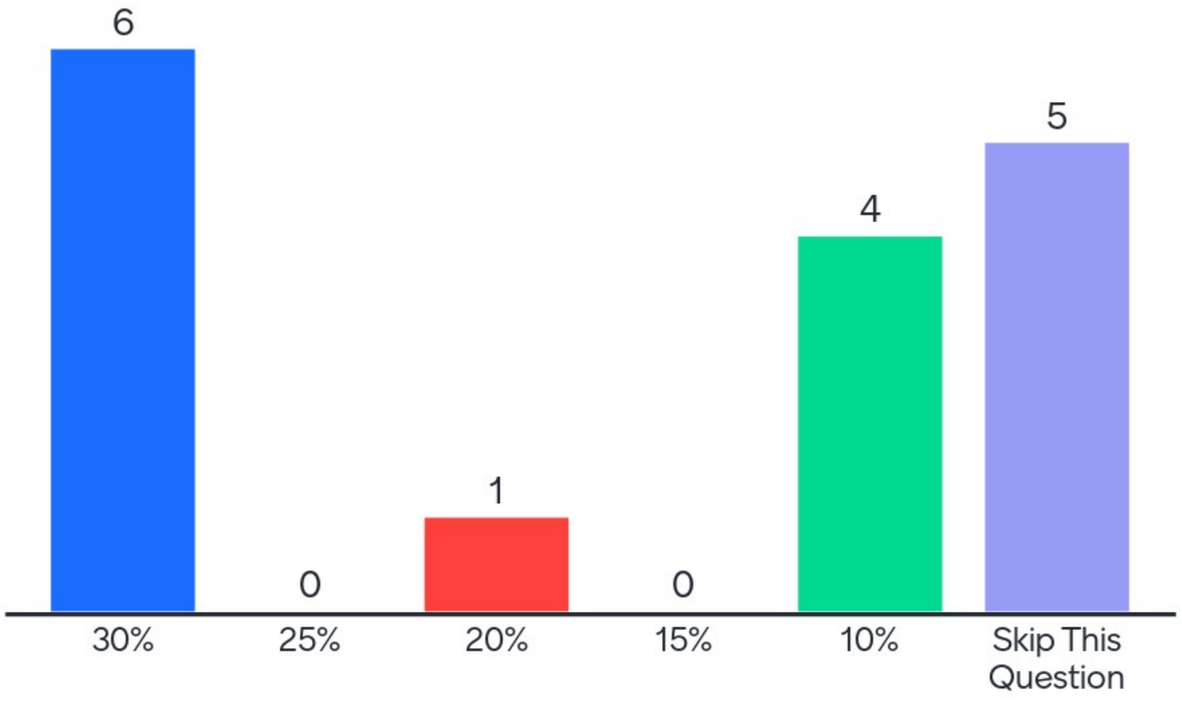
What percentage of Tier 1 resources should be new renewable energy resources (as defined as post-2010) by 2035?



Responses to this question will be entered on the next slide, choices ranging from 10% - 30%

Of that percentage of New Renewable Energy Resources, how much should be local distributed Renewable Energy under 5MW + all Low Impact Hydro Power any size including utility-owned defined by "new distributed" (i.e., current Tier 2 plus hydro)? Current law is 10% by 2032. Any changes to new, local RE include changes to procurement, including eliminating group net metering.

Question on previous slide, given its length. Your answer:



(Optional) Notes, regarding any of your answers about new renewable energy resources. You may submit more than one answer.

22 responses

Not sure agree with premise of how much Tier 1 should be from new post-2010 renewables. Support Tier 1 remaining fully flexible, and achieving other aims through other Tiers.

new renewables are the key to removing greenhouse gases from our regional energy mix and therefore fighting climate change

In state renewable energy should be subject to strong siting and natural resource protection standards (e.g., incentivize solar on built environment).

N/A

These questions seem to have already made some decisions about the future mix, by limiting possible answers.

Counting LIHI as New Renewable is a positive step.

There are multiple challenges with significant new solar deployment. Utilities with small territories will have economic/siting challenges, for example.

The percentages used in several questions contained ceilings. Responses may not represent participants' true answers, but rather their selection of the best option made available in the survey.

REC accounting should be based on annual energy purchases, not annual retail sales, so that we don't lose track of the ~6% in line losses

(Optional) Notes, regarding any of your answers about new renewable energy resources. You may submit more than one answer.

22 responses

I chose high percentages to maximize the reduction of greenhouse gas emissions.

The much more important question is what portion of our power portfolio is low carbon and within that, what resources will keep rates low to encourage use of electricity rather than fossil power.

Lowest cost, reliable energy combined with a portfolio that is zero/low carbon is more critical than the specific breakdown between the two tiers.

Our view is informed by the impact of resource selection on system reliability. In all our work, we seek to meet state clean energy mandates, ... con't

Local distributed renewable power tends to be more expensive and less reliable from a baseload perspective. There are other reasons why such power is valuable but reliability and price matter for CC.

Creating limits on size or type of Tier 1 creates challenges for achieving a renewable portfolio as we figure out how to cost-effectively add new renewables (which benefit from size & scale)

to the degree they apply directly to VELCO, that strike the appropriate balance between that meet federal reliability requirements consistent with affordability needs.

N/A

New renewables requirements unnecessary as with forecasted growth and 100% renewable it will be an automatic outcome. The timing of growth & renewable development is uncertain so best to keep flexible

(Optional) Notes, regarding any of your answers about new renewable energy resources. You may submit more than one answer.

22 responses

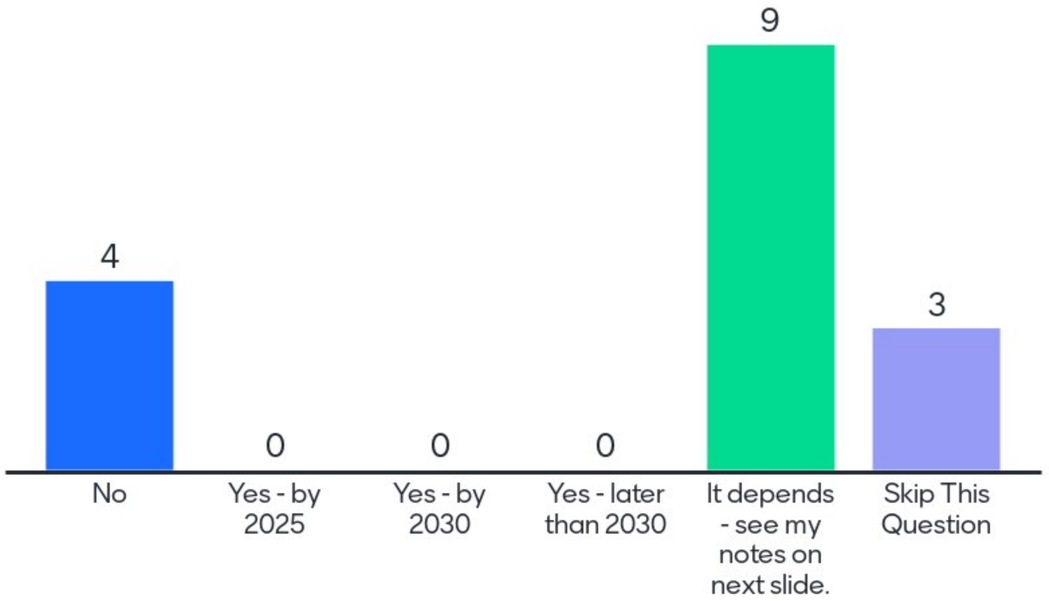
Making ALL LIHI hydro eligible for T2 (1500 MW in NE + NY) would massively distort T2 - not OK. Muni DU owned hydro is a much smaller universe.

Changes like eliminating offsite NM only work w/in a package w/new procurement programs. LMI VTers & renters in particular have little opportunity - ending group NM w/o other avenues makes that worse.

DUs should be able to contract with new or distributed generation as best meets affordability and reliability goals, rather than a fixed percentage.

NA

“Unbundled RECs” - Should the use of RECs not committed to as part of energy/capacity contracts be eliminated?



(Optional) Considerations / Notes regarding using RECS that are not committed as part of energy / capacity contracts?

15 responses

unbundled RECs should continue to be allowed if we want to meet our goals. Mandating only bundled RECs limits flexibility and adds potential cost.

N/A

When region reaches 100% renewable, unbundled RECs become less of an issue. But that is long ways off. Until then, unbundled RECs are OK if from new in-region renewables but not if from large hydro

Unbundled RECs from new, in region renewables incentivize the deployment of new renewables. Unbundled RECs from old, out of region large hydro should not be eligible for meeting Tier 1 requirements

There are economic and physical reasons for RECs. Any such restrictions would bring cost implications and undermine affordability. They should be fully analyzed before consideration.

N/A

Unbundled RECs from large out-of-state hydro should be phased out ; unbundled RECs from other resourves are okay.

Unbundled RECs are fine as long as Tier 1a and Tier 2 don't include older resources and their respective percentages are high: Tier 1a (30%) and Tier 2 (30%).

There seems to be a misunderstanding about why the REC system was created. It was created to efficiently spur the development of renewables. Is it doing that is the question, not bundled or unbundled.

(Optional) Considerations / Notes regarding using RECS that are not committed as part of energy / capacity contracts?

15 responses

There is no concern with RECs and Energy being discrete values. What is important is that the energy is delivered to or produced and consumed within NE thereby offsetting elect produced by fossil fuel

The REC market is a mature, well-constructed market to ensure renewable energy integrity. Some contracts like HQ distribution service and nuclear don't come with REC's. Key affordability lever.

It depends how the RES changes, but unbundled RECs from large, out-of-region hydro slows deployment of new renewables so if we aren't capping Tier 1 then these RECs should be eliminated.

Unbundled RECs are not the problem per se, though the effect of unbundled RECs from large hydro is concerning w/o significant new requirements for new renewables.

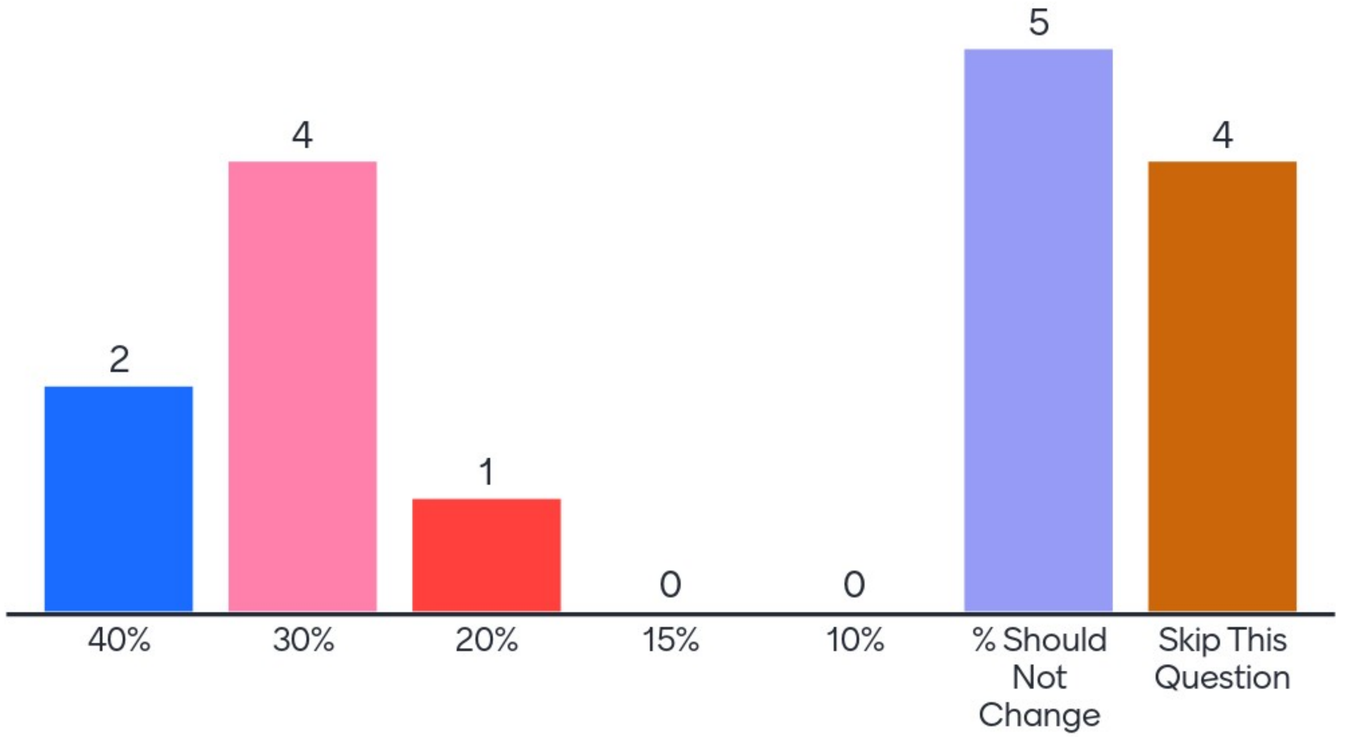
We would not support changes that undermine the ability to mitigate rate impacts through RECs.

Again, from a financial perspective, REC/ACP is one consideration that works. However, from an operational perspective, REC confuse the realization of the policy.

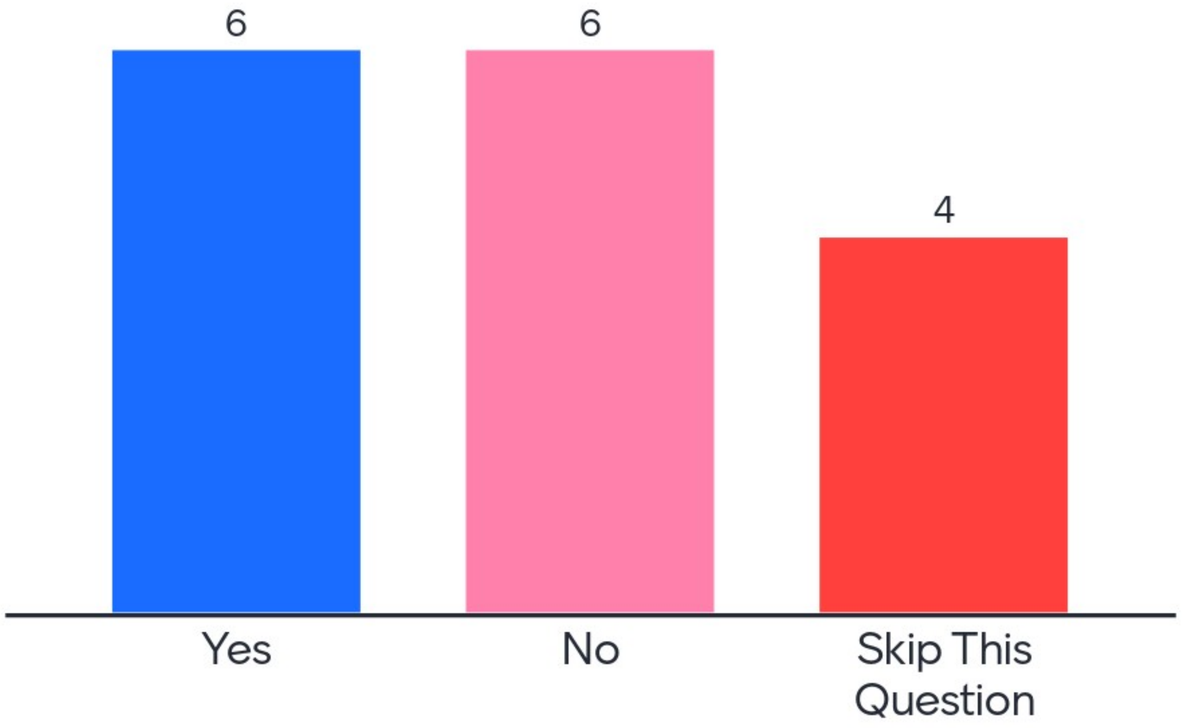
TIER 2: Questions 12 - 14

You may skip any questions that you do not wish to answer, as needed. For open text questions that you dod not wish to answer, enter "N/A"

Should the percentage of distributed renewable energy change? To what?



Should the current list of Tier 2 eligible resources change?



If yes, what types of resources should be added or removed?

13 responses

no changes to tier 2 eligibility are necessary

N/A

N/A

No new wood biomass

It should change if that would decrease Vermonters' contribution to carbon load, and not if it will not.

Expanded to include LIHI-certified hydro facilities of 5MW or less and within Vermont. New sub-tier of "new regional" = any size/type/location of RE built after 2010 - within or delivered to ISO-NE.

How does this differ from question 8? That seemed to apply to Tier 2 resources. Regardless LIHI hydro should qualify for Tier 2.

This is outside our responsibilities and mission. We will of course continue to provide analyses from a transmission grid reliability perspective of the impacts of whatever percentage is decided upon

Increase the size of Tier II renewables to include projects greater than 5MW.

If yes, what types of resources should be added or removed?

13 responses

Add >5MW & 2010 dates. Revise net metering rules to reduce cost and eliminate group NM. With these changes we can get to 20%.

n/a

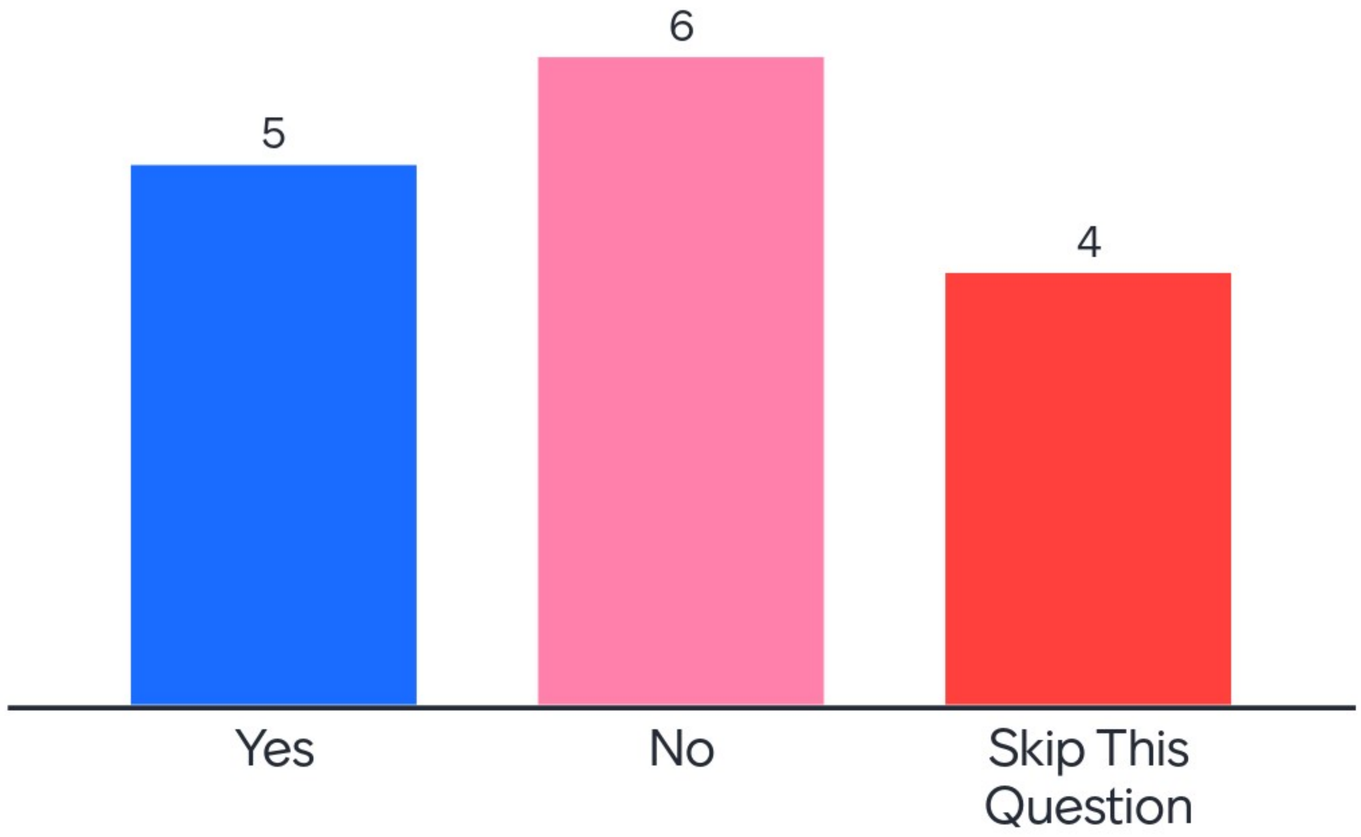
As we have said in the past, open to older muni-DU-owned hydro counting as it would have a limited impact & could contribute to keeping important renewables online. LIHI hydro broadly - no.

Eliminate Tier 2 or otherwise change to allow DUs to contract with resources as best meets affordability/reliability goals rather than a fixed percentage, expand to clean/minimal GHG as available.

Tier 3: Questions 15 - 16

You may skip any questions that you do not wish to answer, as needed. For open text questions that you dod not wish to answer, enter "N/A"

Would you suggest any changes to Tier 3?



If yes, what changes? You may submit more than one answer.

15 responses

Only that we should add some limited language to ensure utilities can go above and beyond Tier 3 goals when they are able to. Tier 3 works well, is a major climate policy, and should not change.

Consider revising Tier III so that its RECs cannot be double counted against Clean Heat Credits - unclear whether this should be done now or wait for final AHA implementation

In general, an expansion of Tier 3 would be beneficial from a climate perspective, but may be more than we can bite off during this task group's time together.

Increasing Tier III commitments to encourage more energy transformation projects

Tier 3 could be impacted by the outcome of the Clean Heat Standard - it is unclear whether projects done for Clean Heat will make them ineligible for Tier 3. The requirements need to work together

See previous response

Creating a Tier III carve-out for energy transformation projects that benefit LMI households

N/A

N/A

If yes, what changes? You may submit more than one answer.

15 responses

Tier 3 credits should be allowed to count towards a utilities Tier 2 obligation, rather than just allowing Tier 2 credits to count towards Tier 3. This will allow a more flexible and effective system.

T3 works well as-is, with significant incentive programs and carbon reduction and it increases annually.

N/A

n/a

Increase the flexibility for utilities to meet overall Green House Gas reductions. Different utilities have different methods for reducing GHGs

I feel I need more information on options and impacts.

Renewable Energy Standard, Overall: Questions 17 - 19

You may skip any questions that you do not wish to answer, as needed. For open text questions that you dod not wish to answer, enter "N/A"

Are there any other changes you think should be made to the Renewable Energy Standard? You may submit more than one answer.

21 responses

Focus new requirements on load growth. Don't limit resources, we need hydro, biomass, solar, wind and other technologies to cost-effectively and reliably meet our goals.

Base REC requirements on annual energy purchases, not sales.

Offshore Wind seems to be in trouble with contract withdrawals and major price increases. We should NOT build the RES around assumptions of what will be built or what loads will be in the future.

No new wood biomass facilities should be considered REC eligible. Current RES requirements are based on annual retail sales. This should be changed to annual purchases to account for ≈6% line loss

N/A

Simpler is better - and more affordable. Focus on defining what needs to be accomplished and setting broad requirements then the utilities and PUC can find the most flexible/affordable path forward

none

I continue to believe we are spending resources in the wrong place. Tier 1 should go to 100% with the utilities charges with doing so affordably. Most effort should be on electrification

I'd like to see us lift the cap on the capacity of net metered systems for municipalities.

Are there any other changes you think should be made to the Renewable Energy Standard? You may submit more than one answer.

21 responses

Please see H.320

The high cost of net metering and the fact that the power produced frequently does not coincide with when and where it is needed must be adresses.

Increase size of projects for Tier II to greater than 5MW. Allow greater flexibility in meeting Tier III reductions targets

We would support taking into greater account the location of renewable generation projects, more specifically along the lines of grid reliability, affordability, and community equity impacts.

From a carbon load standpoint, net metering is actually often counter productive in that is increases costs unnecessarily without decreasing Vermonters' carbon loads.

Net metering costs must be addressed. California has a great model to respect grid constraints, costs and encourage storage.

Regarding reliability, diversity of resources in terms of location, size and fuel is a critical element for maintaining overall system reliability.

Consider a provision that if a customer decides to accelerate or has their own specific RE goals moving to more qualifying renewables sooner, we are able to remove that load from RES compliance #s.

At a minimum net metering incentives must be reduced and group net metering eliminated.

Are there any other changes you think should be made to the Renewable Energy Standard? You may submit more than one answer.

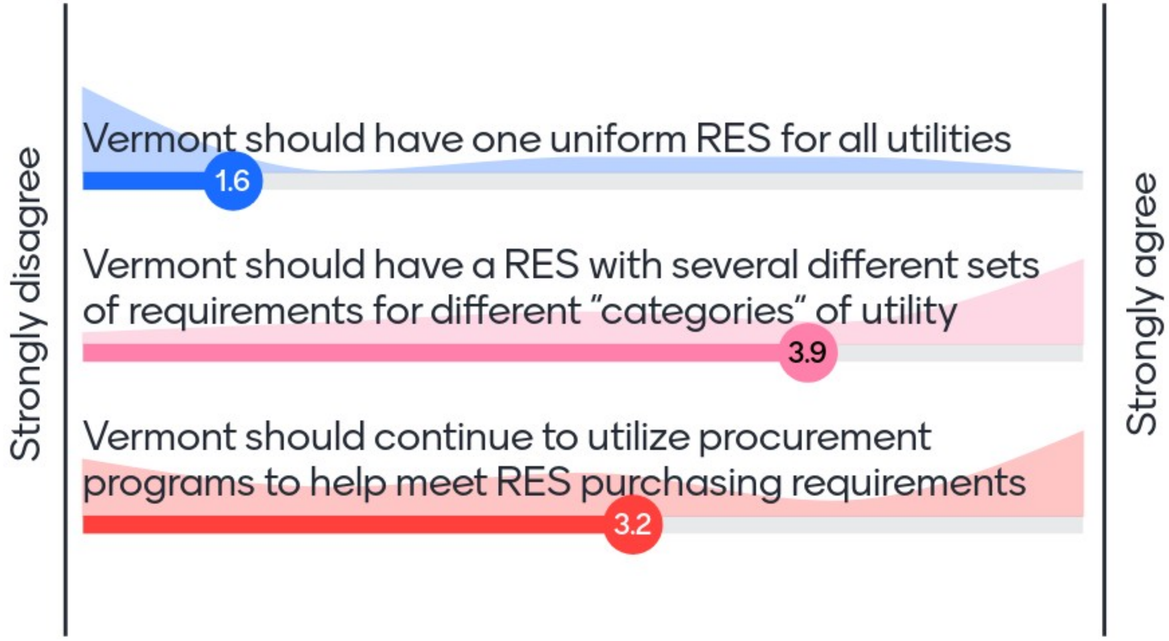
21 responses

The way we measure RES compliance is based on annual retail sales, it should shift to power purchases.

Switching the universe covered from retail sales to annual energy purchases minus any sales to the market/other DUs. It makes no sense to ignore line losses and DU use - that should be from RE as well

As noted previously, the RES should move toward a CES with more broad/global requirements allowing more flexibility in meeting them with greater affordability and reliability.

To what extent do you agree with the following statements? Scale of 1-5, where 1 = (Strongly Disagree) and 5 = (Strongly Agree)



(Optional) If you believe the RES should be addressing any other policy areas, please note that here. You may submit more than one answer.

16 responses

Explore opportunities for different renewable energy ownership and access models (e.g., community ownership).

The RES should be addressing fewer policy areas. Although described as a climate change program it encompasses much more, on the backs of ratepayers. Simplify.

N/A

Net-metering policies

N/A

The process of looking at the RES needs to be honest and comprehensive about the costs and benefits of net metering from a ratepayer, infrastructure and carbon reduction standpoint.

Solar siting policies

Please see H.320

The process of looking at the RES needs to be honest and comprehensive about the costs and benefits of net metering from a ratepayer, infrastructure and carbon reduction standpoint.

(Optional) If you believe the RES should be addressing any other policy areas, please note that here. You may submit more than one answer.

16 responses

Ultimately, the RES needs to be about reducing Vermonters' overall contribution to carbon load, including by encouraging beneficial electrification.

(1) The RES can set the targets for renewable percentages by type/category but that procurement can be done most cost-effectively and efficiently, taking different utility needs into account [...]

(2) through utility led programs overseen and authorized as needed by the PUC. Also, making changes to procurement to promote more renewables at a more affordable price for VTers should go hand [...]

(3) in hand with any increase to Tier 2; for ex., supporting broader and more cost-effective solar programs than the program of limited size, higher priced group "net metering" currently allows [...]

(4) Removing this type of program would also permit net metering to remain a key program for offsetting onsite load.

N/A

Ensuring procurement programs can effectively serve LMI VTers, renters, BIPOC VTers, and other underserved populations is important. They have largely been left out of this transition to date,

Thank You

Results will be available in aggregate form prior to the October 25, 2023 RES Working Group Meeting. You may find them on the working group's website: https://ljfo.vermont.gov/committees-and-studies/renewable-energy-standard-working-group