

Clean Heat Standard Technical Advisory Group

19 September 2024

Statement of the Technical Advisory Group (TAG) on matters raised in the Vermont Fuel Dealers Association's filing of 29 July 2024 and follow-up memo of 27 August 2024.

In its filing of 29 July 2024 and memo of 27 August 2024, the Vermont Fuel Dealers Association (VFDA) describes administrative and financial challenges that the Public Utility Commission's (PUC) 10 July 2024 straw proposal, if adopted, will create for VFDA members who are obligated parties subject to Act 18 (the Affordable Heat Act). These challenges have to do with (i) establishing and collecting the per-credit fee, (ii) accounting for clean heat credits, and (iii) establishing ownership of clean heat credits.

With respect to items (i) and (ii), the TAG finds at this time that VFDA's recommendations, if adopted, should not adversely affect the implementation and administration of the Clean Heat Standard as they relate to those matters on which the TAG is statutorily directed to advise the PUC.¹ With respect to item (iii), the TAG refers the PUC to our statement on credit ownership, dated 16 May 2024.

Approved by motion and vote, (**9 in favor, 1 opposed**) on ~~19~~ 19 September 2024.

Frederick Weston, Chair

¹ 30 VSA §8128(a)(1)-(10).