

Good Morning Members of the House Energy and Technology Committee. Thank you for this opportunity to engage with you on how best to implement climate action over the next three decades. I'm excited to see the enthusiasm for what is the greatest challenge humans have ever faced. LCRCC and our members understand the need for climate action and we see H.688 as one component of such action.

Throughout the process of acting on climate change, we must pay close attention to balance resilience, emissions mitigation, and adaptation which the committee has stressed. In addition to these factors, social equity needs to be considered and we were glad to see a sub-committee focussed to that end. The bill seems to try to balance those priorities, however, at the end of the day, the objective that seems to stand out and be where the buck stops is emissions mitigation.

The critique by many climate activists is that we have arrived at a climate crisis or emergency due to a repeated cycle of focussing on short-term gains or targets, so it strikes me as odd that their answer is to build mandatory non-flexible short-term goals. In the interest of long-term planning, we might also suggest having this bill apply to 2030 and 2050 goals, to allow for further planning and balanced priorities. 2025 goals represent a tight turn-around time considering the inside and outside lag times of rulemaking.

This conversation is not unique to Vermont as across the world governments, particularly in developing countries, need to balance the dual objectives of growing a prosperous economy while also mitigation emissions. Many working in international development have for that reason have embraced the use of Multi-Criteria Decision Analysis tools to help weigh goals and factors

in an effort to build a credible and optimized policy outcome. We suggest the addition of language to this bill to prescribe weighting of criteria and factors to develop rules that deliver an alternative interim emissions target if so needed.

What happens if we miss emissions reductions by a percent because we made accommodations for resilience or social equity concerns? Is there an emissions mitigation equivalent that can be created for resilience or adaptation programs that provide mitigation as a co-benefit? These are questions that should be answered in such a way that legislative intent is clear.

For example, grid modernization covers mitigation, adaptation, resiliency, and social equity, however, it scores low on the mitigation side despite delivering high emissions reductions in the long run and a base on which strategic electrification can occur. In the short-term, we should be focusing resources on the infrastructure of this nature, to prepare for the grid of tomorrow, however, when focussed on the emissions targets, this kind of work might be overlooked or passed by to achieve more mitigation. Another such initiative would be weatherization, which would deliver slow returns on any investment.

Finally, LCRCC has concerns with the legislature forfeiting such a significant level of authority and believe that any plan should come back to the legislature for approval before rulemaking. If this legislation plays out as planned, it will have significant impacts on all areas of state government including budgeting.

Thank you for this opportunity to engage on this issue. This current climate crisis As always, please consider LCRCC a resource in the future.