

Renewable Energy Standard Reform Working Group

Submitted Public Comment

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There seems to be a fundamental misunderstanding regarding the possible economic/societal benefits of the RES. Carbon concentrations linger for centuries in the atmosphere. Clean energy generation does not reduce GHG concentration in the atmosphere; it can only moderate the rate of increase of GHG by avoiding emissions from "dirty" energy sources (oil, gas, coal). Thus, the absolute best the RES can do is help maintain the climate change impact of GHG emissions in New England at its current level. Current GHG driven climate instability and its economic impact is baked in. RES can slow the rate at which the climate continues to degrade, but it cannot repair the damage that has already been done. It is misleading to suggest that RES will reduce the economic impact of current climate conditions.

Regarding the economic analysis being presented -- there appears to be no accounting for the cost of nature; i.e., when nature is destroyed to install RE (notably for solar or new hydro) the cost does not appear in GDP. Current models account for this as "growth" rather than the upfront and ongoing cost that it is. This is particularly important in Vermont where much of the state's economic activity is connected to the natural environment (e.g., farming, tourism, etc.). Particularly for solar, the RES needs to include siting standards that account for and, whenever possible, avoid these environmental costs.

At present, photosynthesis is the only economically viable means by which atmospheric GHG concentrations can be reduced. Thus, preservation and management of healthy eco-systems should be an RES priority.

Thanks for your attention,

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