



City Council - Transportation, Energy and Utilities Committee

Tuesday, September 30, 2025, 5:00 PM,

Join in Person: Front Conference Room, 645 Pine St. Burlington, VT 05401

Join via Zoom: <https://zoom.us/j/84603122855>

To call into the meeting, including to speak during public comment:

Phone: 312-626-6799, Webinar ID: 846 0312 2855

1. Agenda

1.1. Motion to adopt/amend

2. Adopt Minutes

2.1. Minutes of 8/19/25

3. Public Forum

3.1. Public Comments - 30 min

4. Deliberative Agenda

4.1. planBTV 2050 Mobility (Transportation Plan) - Information - 40 min

4.2. Emissions Reduction/Energy Efficiency Review - Information - 20 min

4.3. Forestry Third Party Review - Information - 20 min

5. Director's Report

6. Councilor Items

7. Next Meeting

7.1. Tentative - 10/28/25, time TBD

8. Adjournment



CITY OF BURLINGTON, VERMONT

CITY COUNCIL TRANSPORTATION, ENERGY & UTILITIES COMMITTEE

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Councilor Mark Barlow, Chair, *North District*
Councilor Gene Bergman, *Ward 2*
Councilor Evan Litwin, *Ward 7*
Councilor Marek Broderick, *Ward 8*

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Transportation, Energy and Utilities Committee of the City Council
Tuesday, August 19, 2025 – 5:00PM
--DRAFT MINUTES--

See video for full meeting: https://www.youtube.com/watch?v=FooouA3m8o_w

Councilors absent: Councilor McKnight

Councilors Present: Chair Barlow, Councilor Broderick, Councilor Bergman via Zoom

Chair Barlow calls meeting to order at 5:00 PM

1. Agenda

Councilor Broderick moves to approve the agenda as posted.

Councilor Bergman seconds.

All in favor, Unanimous approval

2. Minutes of 7/24/25

Councilor Bergman moves to adopt the minutes as presented.

Councilor Broderick seconds.

Councilor Bergman would like more detailed minutes

All in favor, Unanimous approval

3. Public Forum

Quinton Zanderan - Policy Director from One on Climate - Online

4. Deliberative Agenda

4.1 GMT Assessment Methodology Study

Peter Plume & Michele Hobbs, of Reframe Lab and Clayton from GMT presented information.

[Zoom AI Summary:](#)

Strategizing GMT's Sustainable Future

The meeting focused on evaluating GMT's current municipal assessment methodology and strategic path forward to ensure sustainability of transit service in the region, equity

across municipalities, and fiscal stability. Participants discussed the value and future role of GMT in Burlington, highlighting its importance in providing transportation options, reducing private auto use, and supporting economic development. They also explored GMT's funding model, considering regional funding options and barriers, and emphasized the need for more frequent service and route adjustments to accommodate future development. The study is in its initial phase, with several months remaining for further input and planning.

Public Transit Funding and Governance

The meeting focused on discussing funding models and governance structures for public transit, particularly Green Mountain Transit (GMT). Gene and DPW expressed uncertainty about the current funding model's intricacies and called for more detailed information to improve proposals for innovation. They emphasized the need for regional collaboration and suggested convening a larger roundtable to exchange ideas. Gene highlighted affordability concerns and the importance of engaging communities deeply in transit planning. DPW advocated for a regional approach to funding and governance, suggesting collaboration with existing county-level structures. The group discussed potential barriers to changing the funding approach, including perceived threats to Burlington's dominance and the current assessment methodology. They agreed on the need for better education about transit's value to build public support.

4.2 BED Synapse & Building Electrification Institute Presentation

Darren Springer, General Manager of BED, Shelley Kwok & Philip Eash-Gates Of Synapse Energy & Caytie Campbell – Orrock of Building Electrification Institute presented information.

Zoom AI Summary:

The meeting focused on two main topics: a regional transit study and building electrification policies. For the transit study, DPW announced that municipal meetings would be completed by early September, with proposed recommendations and a strategic roadmap to be developed by mid to late October, and a full report expected by year-end. Regarding building electrification, Shelley and Philip from Synapse presented analysis of three Burlington buildings, showing that while electrification measures reduced energy use intensity across all buildings, the economics varied significantly depending on building type and system age. The analysis found that gas heated buildings with rooftop units could electrify with minimal incremental costs, while high-temperature central boiler systems faced more challenges. The presentation concluded that Burlington would be the smallest community in the country to adopt such a policy, presenting both opportunities and administrative challenges.

Transit and Building Electrification Updates

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reduced energy use intensity across all buildings, the economics varied significantly depending on building type and system age. The analysis found that gas heated buildings with rooftop units could electrify with minimal incremental costs, while high-temperature central boiler systems faced more challenges. The presentation concluded that Burlington would be the smallest community in the country to adopt such a policy, presenting both opportunities and administrative challenges.

Weatherization Cost Analysis and Trends

The meeting focused on a presentation about weatherization and energy efficiency measures, with Shelley explaining the cost calculations for different building systems. Gene raised questions about the cost breakdowns, which Shelley clarified by explaining the methodology for calculating levelized costs over a 15-year period. Darren and Chris discussed the current incentive landscape for heat pumps, noting uncertainty about future rebates due to ongoing regulatory processes. Philip presented a national perspective on air-source heat pump costs and trends, suggesting that while costs are slowly decreasing, performance is improving. The group agreed that more data is needed to inform future policy decisions, particularly regarding the affordability of air-to-water heat pump technology for commercial buildings.

Burlington's Building Performance Standards

Caytie presented on building performance standards, explaining that Burlington would be the smallest city to implement such a policy and emphasizing the importance of pairing it with technical support and job requirements. She outlined key components including benchmarking data management, compliance pathways, and the need for clear guidance and support for building owners. Caytie recommended finalizing the benchmarking ordinance, engaging stakeholders, and ensuring adequate time for policy design and implementation, while acknowledging Burlington's existing climate policies and the need to balance multiple requirements.

Energy Performance Standards Policy Discussion

The committee discussed policy approaches for building energy performance standards, with Caytie presenting options including individual percentage reductions and cohort targets. The group explored how these approaches could be implemented in a bureau ordinance, with Philip and Caytie noting that Boston uses both methods while Cambridge successfully employs percentage reductions. The discussion concluded with agreement that Burlington should gather benchmarking data before determining the best approach, and John Bryant provided a brief update on the forestry study which is expected to be completed in September.

4.3 BED Forestry Study Update

John Bryan owner of K2QC Consulting presented information.

Zoom AI Summary: John Bryan provided an update on his forestry assessment analysis for the McNeil Generating Station, highlighting his observations and progress over the past six weeks. He visited 12 logging sites in Vermont and New York, reviewed BED documents, and found the logging contractors to be diverse and passionate about maximizing wood value. John plans to complete his report by September 30th and aims

to present it at a future meeting. The committee expressed appreciation for his work and discussed scheduling the next meeting to accommodate John's presentation.

4.4 Downtown Parking Item

Jackie Esperti, Parking Services Operation Manager presented information.

Zoom AI Summary: The meeting explored the possibility of public-private parking partnerships in Burlington, with Jackie presenting examples of existing arrangements and discussing revenue sharing options. Gene and other counselors expressed concerns about potential conflicts with private property owners and the need to avoid subsidizing parking, while Jackie emphasized that the initiative is aimed at preparing for future parking shortages due to new hotels and developments. The committee agreed to continue discussions and gather more data on parking projections and private lot usage before making recommendations.

5. Director's Report

Stormwater Agreements and Union Contract

Zoom AI Summary: The meeting covered several key updates and decisions. The group approved stormwater agreements with homeowners' associations, including a minor tweak for Strathmore HOA regarding stormwater facility responsibility, which will be presented to City Council on September 8th or 9th. The Board approved a 3–4-year collective bargaining agreement for urban drivers that provides financial stability but may lead to service cuts being evaluated by GMT in November 2026.

6. Councilor Items

None

7. Next Meeting

September 30, 2025 at 645 Pine St at 5:00 pm

8. Adjournment

Chair Barlow adjourns meeting at 7:28 pm.



**State of Vermont
Public Utility Commission**

July 31, 2025

Kerrick Johnson, Commissioner
Department of Public Service
112 State Street
Montpelier, VT 05620

Dear Commissioner Johnson:

The Department of Public Service (“Department”) recently stated in a Commission case that the City of Burlington Electric Department (“BED”) “has exhibited a concerning pattern of regulatory errors, inconsistencies, and shortfalls in recent years” and that stronger regulatory oversight is necessary to secure improved performance by BED in the context of its energy efficiency utility program.¹ In a July 2 *Seven Days* article regarding BED’s failure to properly document renewable energy credits from the McNeil Generating Station, you stated, “Prudence would dictate, in order to protect ratepayers, you look at the outward signs of effective management.”²

The Vermont Public Utility Commission (“Commission”) has observed this pattern of errors, inconsistencies, and shortfalls by BED both in its capacity as an energy efficiency utility and as a distribution utility.³ We identify the following examples in both current and past case.⁴

In Case No. 23-1985-INV, regarding 2024 energy efficiency charge rates, BED’s initial proposal was based on budgets larger than those approved by the Commission.⁵ Although this was corrected before a decision was issued, this lack of precision had the potential to cause BED ratepayers to overpay for EEC-funded activities.

In Case No. 22-3947-TF, BED filed a revised net-metering tariff to correct an error affecting 206 customers and amounting to \$26,275 in under-compensation.

¹ Case No. 25-0231-INV, Department Comments of 4/25/25.

² Kevin McCallum, *An Error Cost Burlington Electric \$1 Million*, SEVEN DAYS, July 2, 2025, <https://www.sevendaysvt.com/news/an-error-cost-burlington-electric-1-million-43900313>.

³ We opened this case to ensure transparency of this dialogue. This is not a Commission investigation.

⁴ We note that Chair McNamara is recused from some of the cases identified below. See Chair McNamara’s memorandum regarding conflicts and recusal (2/9/24), available at <https://puc.vermont.gov/document/chair-mcnamaras-memorandum-regarding-conflicts-and-recusal>. However, this case does not involve making new determinations regarding the merits of these past cases.

⁵ Case No. 23-1985-INV, BED Revised EEC filing, 11/3/23.

In Case No. 24-1832-INV, regarding energy efficiency charge rates for 2025, BED identified a significant negative balance in its EEU fund. The negative balance is likely the result of years of compounded errors in BED’s energy efficiency charge calculations. The Commission opened Case No. 25-0231-INV to investigate the negative fund balance.

BED did not report output and fuel type for the McNeil Generating Station for the third quarter of 2024 in the NEPOOL GIS system. As a result, BED lost approximately \$951,000, while Green Mountain Power Corporation lost \$600,000 and the Vermont Public Power Supply Authority lost \$260,000.⁶

In Case No. 21-2701-INV, regarding 2022 energy efficiency charge rates, the Commission found that the manner in which BED had pursued its proposal was unacceptable because BED was aware that its proposal was inconsistent with a Commission Order yet made no mention of the inconsistency in its initial filing. The Commission noted that “the regulatory process is harmed when an entity subject to our jurisdiction does not act in a manner consistent with our decisions, particularly where such an entity acts as though it can make unilateral decisions that are inconsistent with a Commission order.” The Commission stated that, going forward, it expected “marked improvement in BED’s regulatory diligence.”

On March 28, 2022, the Commission issued an order regarding its overall performance assessment of BED as an energy efficiency utility.⁷ The Commission found inconsistencies in BED’s regulatory engagement. In its discussion, the Commission references Case No. 19-3272-PET, in which the Commission determined that BED had made multiple filings “that were late, had internal inconsistencies, were missing information, or included other mistakes.”⁸ BED was directed to develop “robust processes for the internal review of documents before they are filed with the Commission, compliance checks to ensure timely response to Commission orders, and quality controls to verify that filings are made in the appropriate case(s) with all required materials.”⁹ BED was directed to put these processes into place before the commencement of the next demand resources plan proceeding. The Commission stated that it is important for BED’s filings to be timely, accurate, and complete.¹⁰

In Case No. 24-0598-PET, BED petitioned the Commission to reimburse its distribution utility operating accounts for expenditures that were incurred for the District Energy System (“DES”) in calendar year 2023. The Commission denied the petition because BED should have requested Commission approval of the expenditures in advance, and

⁶ <https://www.sevendaysvt.com/news/an-error-cost-burlington-electric-1-million-43900313>

⁷ *Petition of the Department of Public Service, pursuant to 30 V.S.A. § 209(d)(2), requesting a proceeding to conduct Energy Efficiency Utility overall performance assessments and consideration of re-issuance of EEU order of appointments to provide services*, Case No. 21-1500-PET, Order of 3/28/22.

⁸ *Id.* at 15.

⁹ *Id.* at 16.

¹⁰ *Id.* at 18 (“BED has failed to meet several QPIs and MPRs over the past two performance periods. In the context of BED’s organization qualifications, the Department seeks to see more evidence from BED that it is recognizing these shortfalls in a timely manner and managing the EEU’s resources to address the shortfalls earlier in each performance cycle. It is incumbent on BED to continually assess performance and to bring issues to the Department and the Commission, as appropriate, as soon as the issues reach a reasonable level of concern.”).

because the petition was ultimately an untimely effort to reconsider a prior Commission denial of a similar request.

In Case No. 24-1848-TF, BED asked the Commission to reopen its approval of BED's 2024 rate case decision due to errors in BED's cost of service. BED stated that its cost of service unintentionally included \$100,460.31 of expenses associated with the DES and did not disclose this information in a discovery response. As a result, the Department's testimony and the Commission's order are based on erroneous information provided by BED.¹¹

In Case No. 25-1010-INV, the Commission is investigating BED's expenditure of approximately \$2 million of energy efficiency utility and ratepayer funds on the development of a district energy system ("DES") in the 2021-2023 performance period. We will examine "the source(s) of funds for DES support spending, and whether BED had proper regulatory approval for these expenditures."¹²

In Case No. 24A-1346, BED's 2023 EEU Annual Report, BED acknowledged overspending its residential-sector resource-acquisition budget for the 2021-2023 performance period by 33% as a result of invoicing errors. In BED's response to the hearing officer's information request, BED stated, "In hindsight, however, BED should have been more proactive and informed the Commission of these issues sooner than the 2023 EEU Annual Report filing. BED will strive to provide more timely notices in the future."¹³

Act 151 of 2022 provides that an electric energy efficiency utility may use a portion of its approved resource-acquisition budget for specified thermal and transportation efficiency programs if certain criteria are met.¹⁴ In Case No. 22-1473-PET, BED was directed to make a compliance detailing its Act 151 activities because BED's implementation of certain parts of its Act 151 programs was inconsistent with representations that BED had made to the Commission.¹⁵

To date, and as evidenced by the above recent examples, the Commission has taken up BED's regulatory errors, inconsistencies, and shortfalls on a case-by-case basis, addressing the facts of a particular circumstance and the policy or legal consequences. However, the pattern of conduct that this list illustrates may necessitate a more holistic approach. The Commission is concerned that BED has not implemented adequate quality-control measures or identified the root cause of these issues. Therefore, we seek the Department's recommendation on an approach to facilitate effective regulatory engagement. We ask that the Department file a response in the next month in ePUC in this case. We appreciate the Department's consideration of this request.

¹¹ Case No. 24-1848-TF, BED Motion to Alter or Amend, 5/30/25.

¹² Case No. 25-1010-INV, Order of 5/20/25.

¹³ Case No. 24A-1346, letter of 8/13/24.

¹⁴ Vermont Public Act No. 151 (2022 Vt. Adj. Sess.).

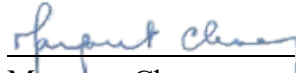
¹⁵ Case No. 22-1473-PET, Order of 7/8/24 ("BED's filings in this case are problematic. We conclude that BED's description of the Act 151 programs that it has implemented continues to be inconsistent with the program plans that BED provided in its DRP and in its re-allocation request.").

This letter is also being issued in multiple open Commission proceedings that concern BED. Vermont's other distribution utilities and energy efficiency utilities and parties to the above cases have been added to receive notice of this letter.

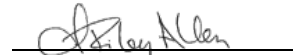
Sincerely,



Edward McNamara
Chair



Margaret Cheney
Commissioner



J. Riley Allen
Commissioner

PUC Case No. 25-1584-INV - SERVICE LIST

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August 29, 2025

Edward McNamara, Chair
Margaret Cheney, Commissioner
J. Riley Allen, Commissioner
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620

RE: Burlington Electric Department

Dear Chair McNamara, Commissioner Cheney, and Commissioner Allen:

Thank you for your letter dated July 31, 2025, in which the Commission notes the Department’s stated concerns regarding Burlington Electric Department’s (“BED”) troubling pattern of “regulatory errors, inconsistencies, and shortfalls.” The letter enumerates a number, but not all of the examples that comprise BED’s regulatory deficiencies, both as an energy efficiency utility and as a distribution utility, that led to the Department’s filings and public statements. The Commission’s letter concludes with a request for the Department’s recommendation “on an approach to facilitate effective regulatory engagement” on the part of BED. As described below, the Department recommends a focused management audit of BED’s key business practices.

More specifically, the Department recommends that the Commission open an investigation into BED’s internal quality controls. As part of this investigation, the Department would engage a firm with the requisite expertise to conduct a business process audit with a specific focus on internal quality controls. It is the Department's expectation that BED would fully cooperate and collaborate with the selected auditing firm. While BED’s internal practices have not yet been assessed, an audit could reveal the need to implement additional quality controls. Examples of such controls include:

- **Regulatory Quality Controls** – Ensuring processes to maintain compliance with state and federal regulations.
 - *Compliance Monitoring* that would include multiple levels of data review, supporting document verification, and independent calculations to ensure filing accuracy.
 - *Reporting Controls* that would include data validation and supervisor review.
 - *Record Keeping* that would include transaction logs and create audit trails for all system changes, including user identification, timestamps, and approval documentation.

- **Operational Quality Controls** - Clear documentation of policies and procedures to understand how decisions are made and evaluate the effectiveness of internal operations with a goal of ensuring consistency, compliance, and accountability.
- **Financial Quality Controls** - Promote fiscal discipline, prevent waste, and ensure that all public funds are spent efficiently and effectively (e.g., *Revenue Management, Expenditure Controls*).
- **Cross-Functional Quality Controls**
 - *Training and Competency* assessments for all employees. Verify employee qualifications before authorizing specific work activities. Ensure adequate staffing levels and provide ongoing training, on-the-job performance monitoring, and feedback mechanisms. Ensure succession planning for critical positions.
 - *Continuous Improvement* processes that identify the root cause or systemic issue requiring corrective action. Implement performance metrics over time to identify degrading performance before it becomes problematic. This is a particularly pertinent discipline lacking at BED.

Again, this list is illustrative. BED's management performance issues regarding energy efficiency and power supply-related functions are well documented. What is not clear to the Department, however, is whether or how far these issues extend and how those issues might further disadvantage their customers. Our recommendation is that the audit focus on the four areas described above while taking a broader look at the overall management structure and culture.

Having said that, as documented in its Service Quality and Reliability Plan (SQRP) metrics, the Department believes it is important to note that BED delivers reliable service to its customers. Further, the Department receives very few complaints from BED's customers, and we note that BED seems to mostly enjoy strong customer support as evidenced by recent bond votes. Most importantly in this context, we do not believe that BED is intentionally obscuring facts or engaging in actions for any malicious purposes.

These are some of the reasons why the Department finds their poor performance in the identified areas so frustrating: they can do better, they know they should, and yet to date they have not. In fact, in the last two weeks, BED withdrew its Revised Miscellaneous Service Fees Tariff dated August 4, 2025, due to the Department uncovering multiple formula errors in the supporting spreadsheets that resulted in incorrect fee calculations. When alerted to these errors by Department staff, BED responds reasonably well but its continued mistakes and need of remedial help diverts precious resources from other critical Departmental responsibilities and comes at an as yet unquantified cost to their customers. Such a state is unsustainable.

The impact of BED's poor performance doesn't just affect their own customers and personnel, but all of Vermont's electric ratepayers. That is why, in the end, the Department recommends that the Commission open the investigation as described. We are mindful of the demands on BED personnel's time, the Department and Commission's time, and the possibility of unintended

negative consequences that may accrue from the recommended audit. Yet, it is BED's own performance that has brought us to this point.

The Department's goal in recommending this investigation and audit is to secure effective, comprehensive and sustained performance by BED to best ensure self-sustained reliable and affordable service. It is intended as a corrective action that the Department decided upon only after careful consideration of all other options. The Department would like nothing better than to help BED quickly secure an end state whereby all aspects of the utility's operations are effectively managed.

Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerrick Johnson". The signature is fluid and cursive, with a large initial "K" and "J".

Kerrick Johnson
Commissioner

planBTV 2050

unified comprehensive plan

Transportation, Energy, and Utilities Committee

9/30/2025

Project Lead:

Phillip Peterson, Senior Transportation Engineer & Planner

dpwplanning@burlingtonvt.gov

Project Team:

Julia Ursaki, Public Works Engineer

Parsa Pezeshknejad, Public Works Engineer

Introduction

2024 TEUC motion highlights

- Support DPW in pursuing funding to update the **Transportation Plan**
- **Collaboration and engagement**
 - Mayor's office, City planning, Walk/Bike council, NPAs, GMT
- Include evaluating downtown **pedestrian/bike-only street** options
 - Conduct pilot closures
 - Traffic impact study

What is planBTV?

planBTV: 2050

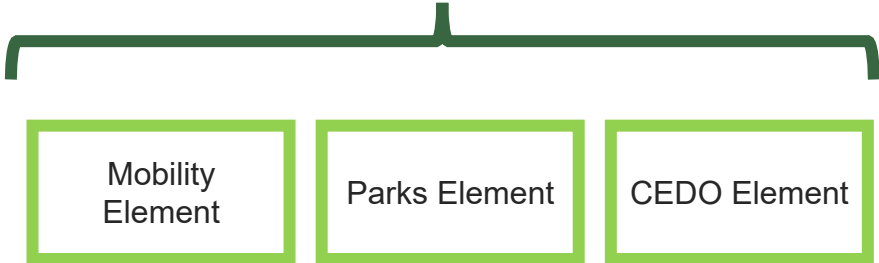
A **holistic long-term** vision that reflects the way Burlingtonians experience the **interconnected city**.



What is planBTV?

PlanBTV: 2050 is a collaboration between the CCRPC and four City Departments

planBTV: 2050



OCP: updating the 2019 Municipal Plan (planBTV) = planBTV: 2050

DPW: updating and expanding a 2011 Transportation Plan

BPRW: updating its 2015 Comprehensive Plan

CEDO: creating a new economic development plan



Municipal plan needs

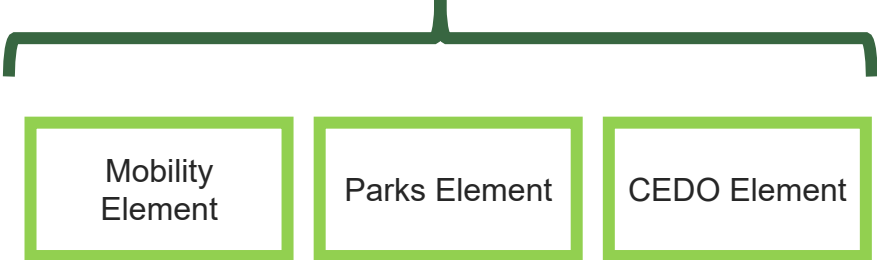
- Strong housing demand with limited capacity to supply
- Housing costs are unsustainably high
- Uneven growth across the city
- Inconsistent federal funding
- Large capital projects stretch the community's capacity
- Referencing and merging similar plans



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Parks, Recreation and Waterfront needs

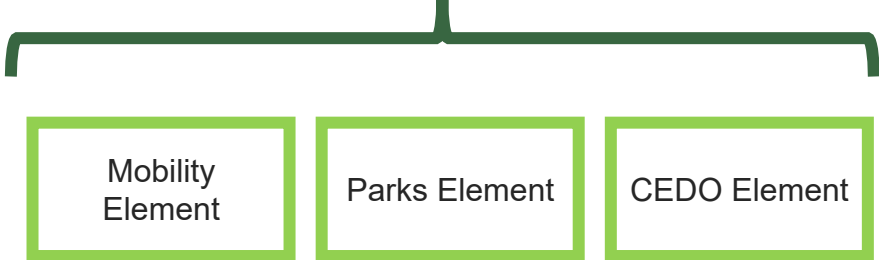
- Increased demands on green
- Pressures on open spaces by unhoused community members
- Focused work on equity and inclusion
- Planning centered on wellness, health and safety
- Anticipating climate change
- Merging and referencing similar plans



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Parks, Recreation and Waterfront needs

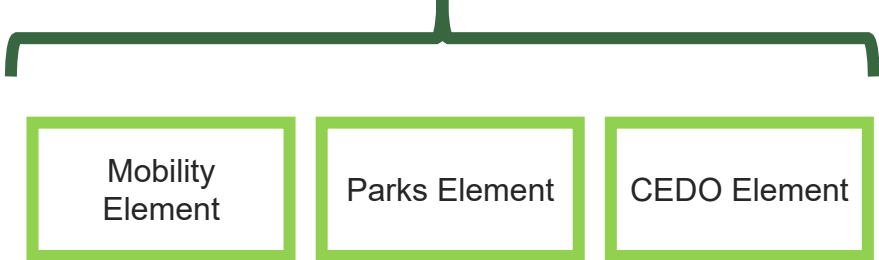
- Burlington has no economic development strategy
- COVID-19 changed consumer behaviors, and reduced downtown foot traffic
- More remote workers resulting in vacant office space...
- Rising rates of homelessness
- A reduction in business revenue
- Economic activity dispersing from heavily-impacted Downtown core



What is planBTV?

PlanBTV: 2050 is a collaboration between the CCRPC and four City Departments

planBTV: 2050



OCP: updating the 2019 Municipal Plan (planBTV)

DPW: updating and expanding a 2011 Transportation Plan = planBTV Mobility

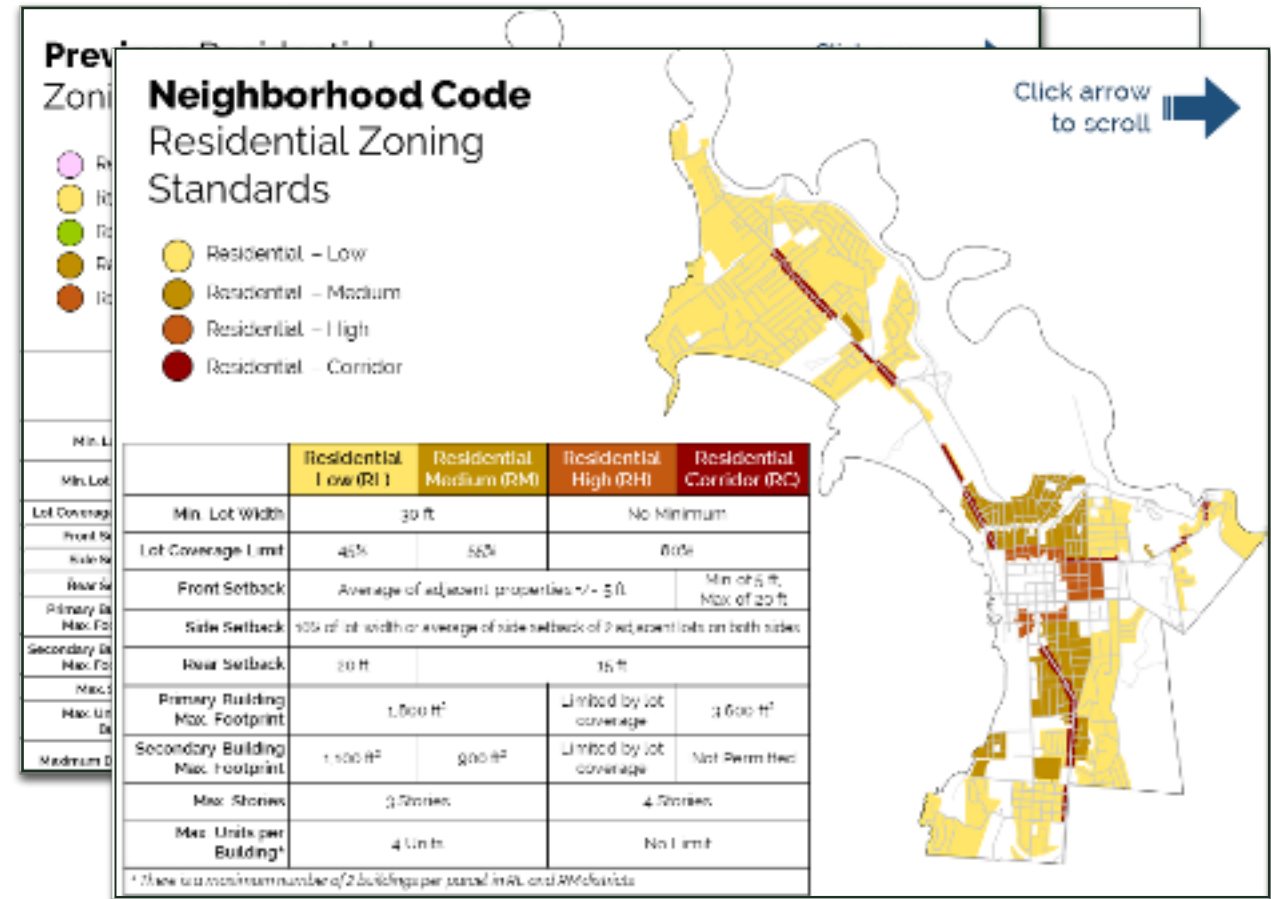
BPRW: updating its 2015 Comprehensive Plan

CEDO: creating a new economic development plan

Why update planBTV Mobility?

Context and need for update:

- Last Transportation Plan update was in **2011**
- **Significant development** since then
- Planning for approx. **7,000 new housing** units by **2050** under act 181
- Need to reassess transportation policies and community priorities

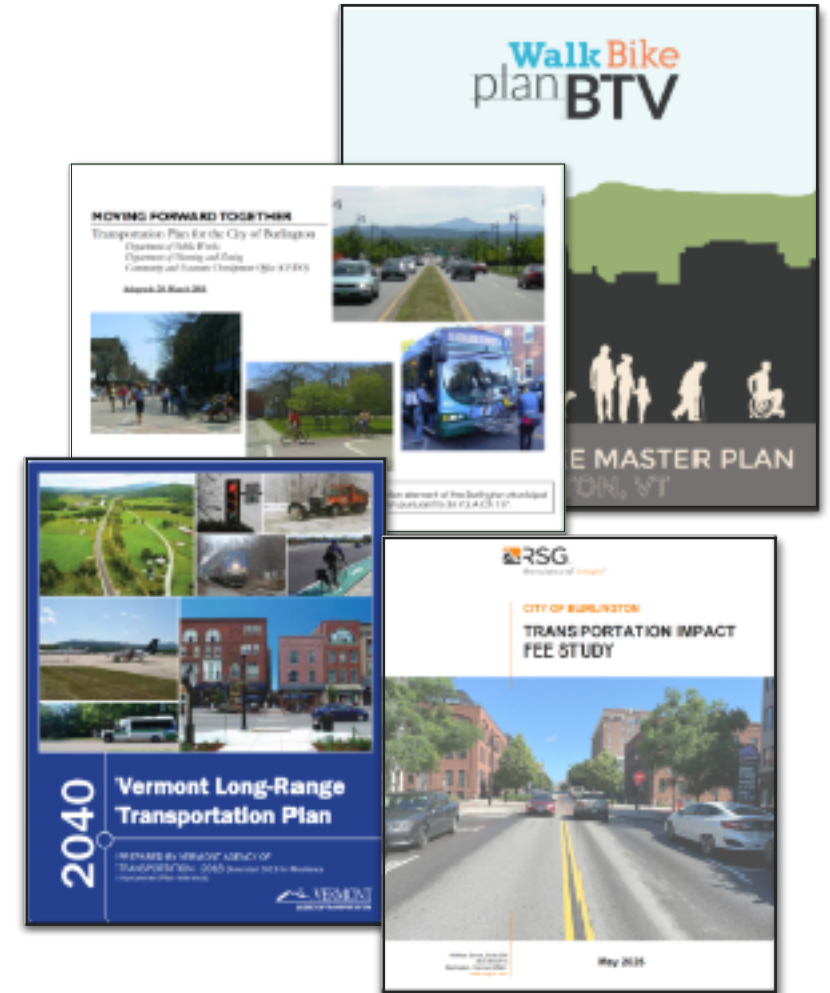


Why update planBTV Mobility?

Integrate several topic and area-specific plans:

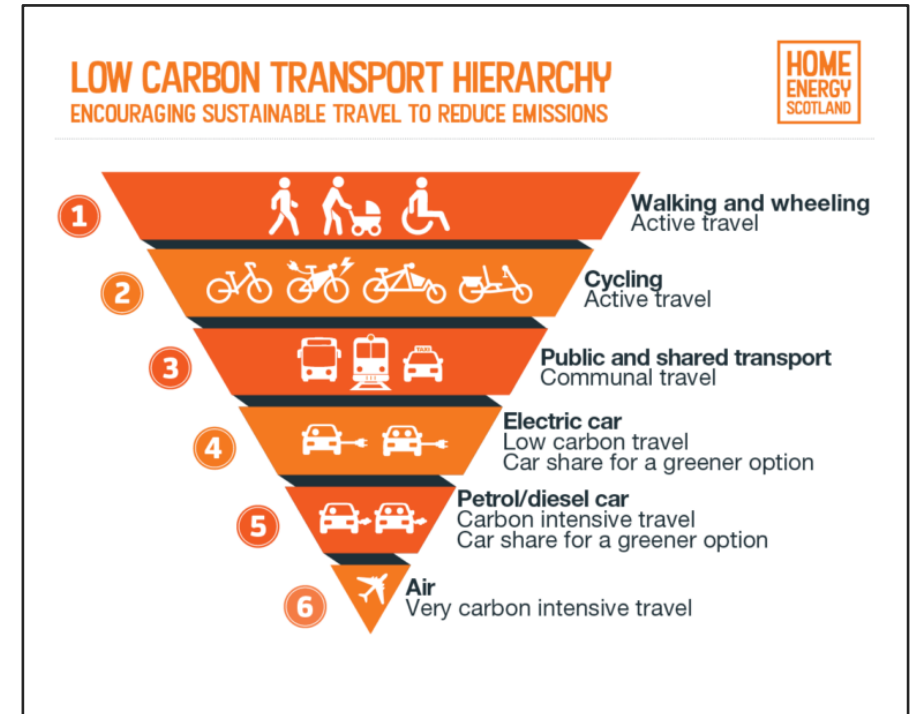
- planBTV WalkBike Safety Action Plan (2025)
- planBTV: New North End (2025)
- Transportation Demand Management (2024)
- North Winooski Avenue Transportation Study (2020)
- planBTV: South End (2019)
- North Avenue Corridor Study (2015)

You can find all here: [Past Projects | Burlington, VT](#)



Visions for PlanBTV Mobility?

- Develop a **long-term mobility vision** aligned with future growth
- Integrate **transportation with land use and housing**



Source: nclurbandesign.org

Implementation and outcome

- **Use scenario-based planning:** explore different futures to prepare for uncertainty.
- **Unify and prioritize:** unify recent/ongoing plans and spotlight emerging issues.
- **Create a guiding framework:** clear structure for future transportation investments.
- **Create metrics for progress:** measurable indicators to track plans.
- **Realistic and actionable strategies:** short, medium, and long-term actions that are realistic.
- **Acknowledge realities:** cars are part of the system, rural context, political landscape.



What's next

RFQ time line

- RFQ issued August 22, 2025
- Virtual pre-submission meeting September 10, 2025
- Questions due: September 12, 2025
- **Proposals due October 8th**
- **Interview period: Mid October**
- Contract awarded/executed November 2025
- Plan Completion: 12/2026*



The Municipal Plan element must be adopted by 3/27/2027. All other plans are under no such time limitation and may extend past 12/2026 as needed. Though it is our goal to complete all elements at the same time

Initial public engagement and outreach

- **Neighborhood planning assemblies (NPAs)**
Visiting NPAs to introduce the process and gather early input.
- **Public visioning workshops**
Will begin this fall starting October
- **Community Survey (will be online mid October)**
A citywide survey will be launched with a QR code
- **Project advisory committee (PAC)**
Currently inviting individuals and organizations to form a PAC
- **More extensive engagement such as focus groups**

Join the planBTV: 2050 team for the start of the Neighborhood Visioning process!

These workshops will set the stage for the upcoming Comprehensive Plan by bringing neighbors together to share ideas, values, and priorities for the future of the community.

South End

5:30 – 7:30pm | Tuesday, October 7th
BCA Community Room, 405 Pine Street

Downtown + Waterfront

5:30 – 7:30pm | Monday, October 27th
Community Sailing Center, 505 Lake Street

New North End

planBTV: 2050 is kicking off in coordination with the *planBTV: NNE* neighborhood planning process, which has been underway since January.

Check out www.burlingtonvt.gov/plan/nne for more information!

Old North End

5:30 – 7:30pm | Thursday, October 23rd
Old North End Community Center

Old East End

5:30 – 7:30pm | Thursday, October 30th
Schmanska Park Barn, 63 Grove Street

Questions

Contact information:

Phillip Peterson
Senior Transportation Engineer & Planner
(802) 598-8356
dpwplanning@burlingtonvt.gov

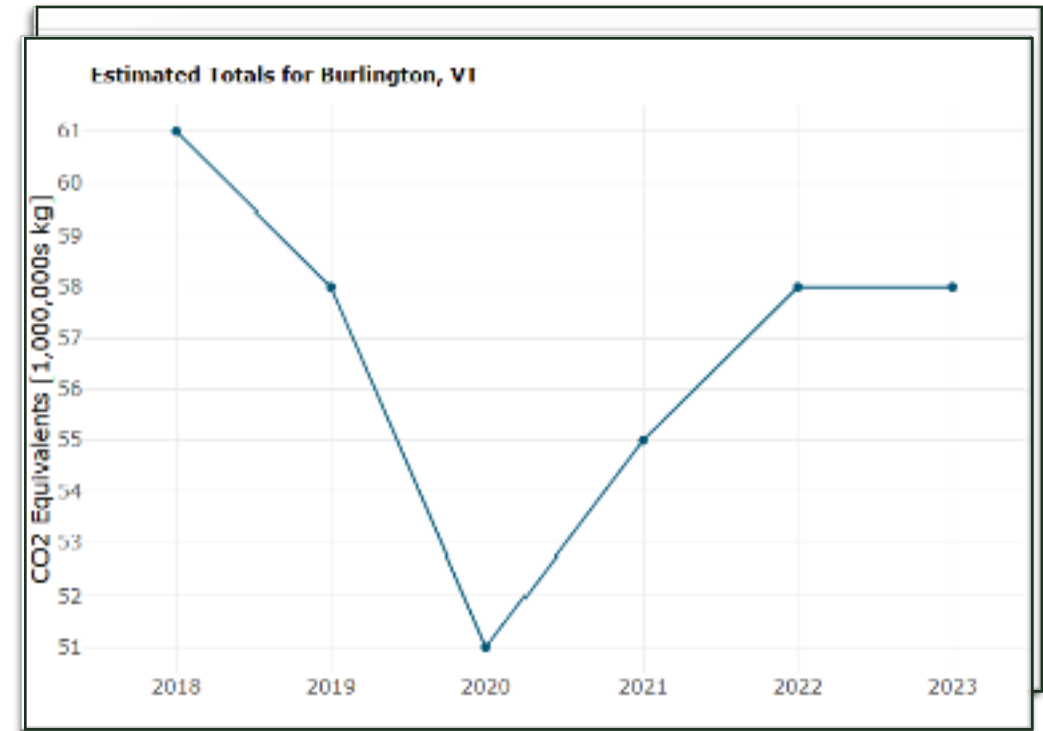
Engagement/outreach

Phase	Task	Description	Notes	October					November			
				1	2	3	4	5	1	2	3	4
Visioning	4.1.1	East End - Schmanska Park	Open Houses; to include summary of relevant adopted plans and planBTV: 2050 visioning					10/30				
	4.1.2	ONE - Community Center										
	4.1.3	DT/Waterfront - Sailing Center										
		South End - BCA Community Room or Champlain										
	4.1.4	College Miller Center										
	4.1.5	NNE										
	4.1.6	Storymap (?) + Survey										
NPA Roadshow	Video											
	Ward 1		Second Wednesday									
	Ward 2		Second Thursday									
	Ward 3		First Wednesday									
	Wards 4/7		Fourth Wednesday									
	Ward 5		Third Thursday									
	Ward 6		First Thursday									
	Ward 8		Fourth Thursday									

Needs and focus areas

Key focus areas:

- Increased trip **demand**
- Electric vehicles and **climate goals**



Source: ccrpctranspstats.uvm.edu

Needs and focus areas

Key focus areas:

- Increased trip **demand**
- Electric vehicles and **climate goals**
- **Land use** and transportation integration
- Multimodal network and **transit system**
- Safe and connected **active travel**

Neighborhood Code Residential Zoning

Click arrow to scroll →

Urban Street Design Guide

Active Roadmap: Best Practices in Rural Mobility (PDF)

Best CS Policies 2025 - Case Studies

Best CS Policies 2025 - States

Source: smartgrowthamerica

Needs and focus areas

Key focus areas:

- Increased trip **demand**
- Electric vehicles and **climate goals**
- **Land use** and transportation integration
- Multimodal network and **transit system**
- Safe and connected **active travel**
- **Access** to needs and, services
- **Mobility** and Roadway management

Neighborhood Code Residential Zoning
Click arrow to scroll →

Urban Street Design Guide

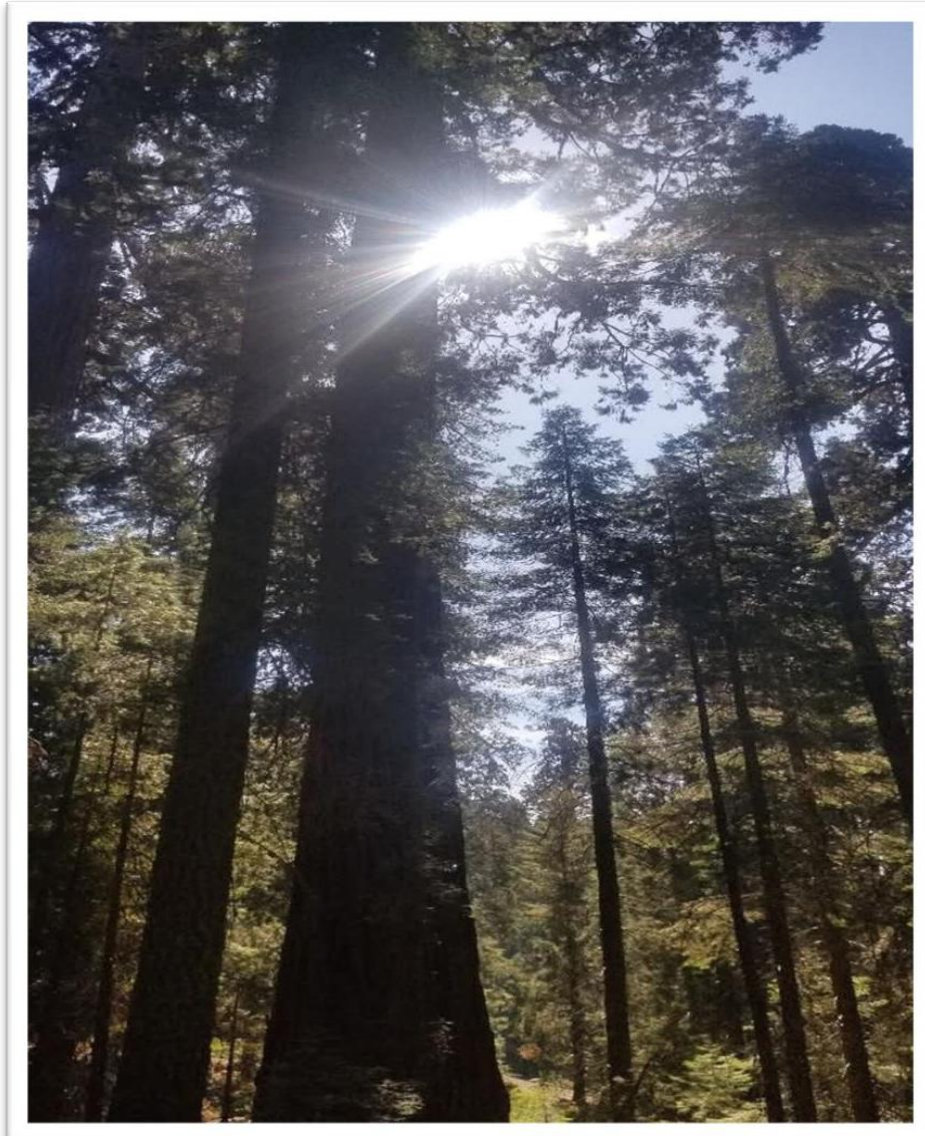
Active Roadmap: Best Practices in Rural Mobility (PDF)

COMPLETE STREETS POLICIES
Best CS Policies 2025 - Case Studies

COMPLETE STREETS POLICIES
Best CS Policies 2025 - States

Source: smartgrowthamerica

Burlington Electric Department Forestry Assessment and Analysis for McNeil



John Bryant
K2QC Consulting LLC
Holden, Maine 04429
207.745.9955
k2qcconsulting@gmail.com

September 30, 2025

Introduction

This report serves as an independent review of the forestry assessment and analysis for the McNeil Generating Station ('McNeil'). As owner of K2QC Consulting, LLC ('K2QC'), I contracted with the City of Burlington Electric Company ('BED') on May 2, 2025 to provide a forestry assessment and analysis for McNeil. BED's RFP 014-25C defines report expectations with audit standards detailed in Appendix A. Founded in 2020, K2QC is a forestry consulting company specializing in forestry, forest management, forest operations, and organizational design.

Overview

The policy of BED to accept delivery of whole tree chips from Vermont harvesting operations that are certified by a professional forester and meet the "Harvesting Policy for Whole Tree Chipping Operations in Vermont" are the central issue for the report that follows.

Disclosure Statement

When I submitted my work proposal in late February, I did not know the city of Burlington had a wood chip to energy plant, nor did I know BED had a forestry staff or anything about the supply system in place to provide wood waste to the McNeil plant. After BED's acceptance of my work proposal and the follow-up BED contract completion in early May, I began work in late May with a clean slate and other than information in the McNeil RFP, I know little about the task in front of me. It was an interesting, informative experience.

Executive Summary

BED has been practicing responsible wood residue purchasing and harvest plan certification since the early 1980's using sound, silvicultural based methods to ensure sustainable timber management on sites managed by forestry consultants or BED foresters. The harvesting policy is the foundation for acceptance of wood chips into the McNeil system. During my field visits, I observed no chipping of trees that could be sold to higher use roundwood or sawlog markets. In my opinion, loggers have no incentive to sell or chip trees that could be sold for a higher return to other markets. I identified no significant issues worth noting in this report. This report identifies recommendations for improvement.

Acknowledgement

I want to thank and acknowledge the BED forestry team – Betsy Lesnikoski, Seth Clifford, Don Tobi, and Kevin Fink for their time and efforts to provide requested documents and harvest plans, answer my questions, educate me to the McNeil system certification requirements, and escort me to the chip receiving locations and BED certified logging sites in Vermont and northeast New York.

Chief Forester Betsy Lesnikoski and the BED foresters are well versed in the McNeil system, state laws and regulations in Vermont and New York, logging service contractor ('logger') dynamics, and the McNeil chip purchase certification process. BED's forestry team were excellent resources as I researched pertinent documents, public records, historical discussions, and the extensive BED certification protocols. BED has a history of continuous improvement, public feedback, and regular reviews of their forestry practices.

Biomass - Wood Residues

The term biomass is widely used in various publications and public policy debates, and means many things depending on the derivation of, or end use of the material. For use in this report, I define biomass as ‘**wood residues**’ from timber harvest operations used for energy production – this includes chips, grindings, sawmill residues, trees with no higher use market, and logging yard debris. The wood residues from forestry operations consist of tree tops, branches, damaged, dying, or dead trees, irregular or bent stem sections, and inferior trees with no market that are removed during timber harvest operations to improve growing conditions for the better quality and more desirable trees.

Landowners, foresters, and loggers make decisions on the use of wood residues to benefit landowners economic return, forest stand aesthetics, soil stability during yarding, wildlife habitat, and timber market availability and value. Trees grow in Vermont and northeast New York in an incredibly challenging environment due to rapidly changing weather conditions (floods, extreme wind events, extreme winter cold temperatures, snow, ice, and ever-changing climatic events), insects, and diseases. These conditions create defective trees that compete with the better formed, desirable trees for light, water, and nutrients to grow. Foresters and landowners make periodic decisions regarding preferred tree species, specific forest management objectives, and desired rotation age which impacts decisions on tree removal and retention of tops, branches, and tree stems in a stand.

Ultimately, a robust wood residue chip market provides increased options for forest management decisions, a renewable resource for energy, and a healthier logging community. Strong diverse timber markets are the basis for good forest management practices, when proper harvest planning and oversight are implemented. The McNeil system is a valuable wood residue market for loggers.

Field Visits to Harvest Sites

With the assistance of BED foresters, I visited 14 active and 5 inactive or closed winter harvest sites selected randomly in Vermont and northeast New York to view timber harvest operations and talk with loggers about their planning process, regional timber markets, and impressions of the McNeil system. The loggers visited represent approximately 58% of the 2024 volume delivered to the McNeil system. Given the coordination and time allocated, I did not have time to visit every harvest site or logger – I viewed a good cross section of loggers and diversity of harvest activity.

During my field visits, I had conversations with the following loggers or in-field representatives of the logger.

Darren McDonald	Patrick Remillard	Montgomery Logging
Jason Lathrop	Tom Lincoln	Justin Lathrop
Patrick Gregoire	Mike Parker	Richard Hallstrom Logging
Gabe Parent	Kenny Bigelow	Adirondack Forest Fiber

During my initial visit to Burlington, I toured the McNeil plant and the Swanton yard to understand the process of receiving and using wood chips at the two points of delivery. I reviewed delivery and cost data for the McNeil system to understand trends in recent years. I estimated 60% of the field visits were on Vermont harvest sites with the remaining 40% in New York.

Logging Service Contractor Observations

- a. I was extremely impressed with the diversity of loggers and logging systems in the McNeil supply system, the professionalism and passion for their work, and their ability to maximize the value of timber to the best possible use from harvest sites.
- b. Loggers speak highly of, and rely on, the McNeil system to assure silvicultural objectives are accomplished and local markets are utilized to optimize timber value.
- c. Loggers are extremely complimentary of the Swanton Yard and the efficient process used to unload chip trucks and the yard operators ability to address any issues.
- d. There are legitimate economic challenges for loggers in the McNeil supply system and the long-term supply chain, which will require continued focus on listening to suppliers and working together to ensure future system viability.
- e. Loggers emphasized the importance of a regional wood residue market as it creates jobs in rural, forest-based communities, provides a revenue stream from low-value trees and wood residues, and supports improved silvicultural options.
- f. Vermont has some of the most challenging terrain for forest management and removal of timber. The landscape has been worked for many centuries for dairy farms, agriculture, maple sugar production, timber production, and recreation. I marvel at the ability of local loggers to understand how to work in this landscape and sustainably produce timber products for sale.

Logging Service Contractor Comments

I had four main questions for the loggers interviewed during our field visits; 1) tell me about your timber markets?, 2) what is your process for separating timber for these markets?, 3) what are your thoughts about McNeil and the Swanton yard?, and 4) tell me about your interactions with BED foresters.

Specific comments from loggers (as verbatim as possible given my field notes):

- a. "McNeil is the market of last resort. We only send them wood that does not have another better market or make more money."
- b. "We are not required to manage for rare, threatened, and endangered species ('RTE') and would likely not know if they were present if BED foresters were not involved."
- c. "I have never had a BED forester pressure me to put more wood into a chipper."
- d. "I would not be stopping my operation and move my entire operation if BED did not require protection of endangered bats. BED works with us on that process."
- e. "The delivered price for chipwood is so much less than every other product, we can only afford to chip wood that has no other market."
- f. "When trees come to the landing, we cut them up to maximize the value for the landowner and us – with every part of the tree sent to the highest value market. That is so important to my financial success."
- g. "Sometimes the best use of tops and limbs is to stabilize the trails, so that is where it goes."
- h. "I cannot afford to just chip wood. My operation requires a healthy mix of timber."
- i. "The Swanton yard is very efficient and well run. They get my trucks in and out as soon as possible."
- j. "BED foresters keep me informed and aware of regulatory issues, most notably the bat management issues with Vermont biologists."

- k. “We work with BED foresters to identify alternatives when ground conditions turn poor.”
- l. “BED pays for wood chips received in a very timely manner. They inform us if a payment delay arises. If you run a business, you know how important that is for cash flow.”
- m. “Our business likely would not survive without the McNeil facility.”
- n. “BED foresters are enthusiastic about doing the right thing on the land. We do our best to listen and learn.”
- o. “This equipment you see needs operators, which are in short supply. I am worried about the future. I personally juggle many machines in one day to keep things moving.”
- p. “I depend on the McNeil system to help accomplish my harvest outcomes.’

Harvest Visit Observations

- a. During my visits to ongoing harvests, I observed chipping operations that used either poor quality trees (unmerchantable or with no other market), tops and limbs from trees, or sections of trees that were removed to upgrade a section of the tree to a higher value sawlog or usable section for firewood or pulpwood. All higher-grade trees or sawlogs were separated out for delivery to firewood outlets, pulpwood mills, sawlog markets (US and Canadian), or other local chip using facilities (i.e., Middlebury College).
- b. The harvests utilized a variety of silvicultural systems – primarily single tree selection and group selection techniques. The single tree selection focuses on removal of low-quality, suppressed, short-lived species, and overmature high-risk trees. Group selection focuses on creating openings in the forest to encourage natural regeneration. The silvicultural system is well described in the harvest plan process used by BED or the forest consultant hired by the landowner or logger.
- c. Loggers who chip for the McNeil system use chipping as the lowest priority option. If a harvested tree has a higher value option (sawlogs, veneer, pallet logs, pulpwood, firewood, or other local markets), the logger separates the better-quality section of tree from material to be chipped.
- d. I was extremely impressed with the utilization of trees on the logging operations into piles destined for higher use products – loggers are incentivized to sell to the highest value markets. It is in their company’s interest to move products to the highest value market to optimize returns.
- e. Loggers take pride in assuring any tree removed during the harvest operation ends up in a solid wood form (firewood, pulpwood, or sawlogs).
- f. Loggers diligently focus on keeping logging yards as organized as practicable to assure positive aesthetics and clear understanding of merchandized products – sawlogs, pulpwood, firewood, and lower value material destined for chipping. This is very evident when you visit the landings.
- g. Local consulting foresters or landowner staff foresters are directly involved in 60% of the harvest plans that deliver wood residues to McNeil. BED interacts as required on these jobs; however, most of BED forester efforts focus on jobs where no foresters are involved to ensure BED certification requirements are addressed.
- h. On inactive harvests, the wood residues were piled in preparation for chipping. The higher value roundwood was hauled and the low value chip piles will be chipped later.
- i. On closed winter sites, the log landing was cleared and stabilized to avoid any negative aesthetic reaction.

Noteworthy BED Management Practices

- a. The BED foresters documentation of harvest sites and field inspections are impressive and extremely professional – and, in my opinion, the harvest plan documentation sets a standard for non-public lands in the Northeast US.
- b. BED foresters regularly interact with Vermont biologists, as required, to ensure RTE's and associated habitat are identified and protected during harvest operations.
- c. The BED harvest plan checklist includes a lengthy list of important topics – including ACT 250 permits, protected lands identification, agricultural conversion plans, mapping of RTE habitats, wetlands, deer wintering areas, and rare natural communities. BED foresters understand the requirements and can readily speak to the importance and need for compliance on harvest sites.
- d. Silvicultural prescriptions on BED harvest plans are detailed with extensive forest stand data and descriptions of process and desired outcomes.
- e. BED has an excellent relationship with Vermont's Natural Resource Managers including the State Division of Forests, Parks and Recreation, Vermont Fish and Wildlife, and the Department of Environmental Conservation Wetlands division.
- f. BED foresters regularly conduct and document harvest site inspections from locations where McNeil receives wood residues.
- g. BED foresters work in a compliance and a chip procurement role; however, adherence to BED harvest standards (the compliance role) is the first priority. Working closely with suppliers has allowed BED to maintain standards while procuring sufficient wood residues to keep McNeil on line. This concept can be misleading, yet it is an important public pursuit. In a compliance role, a forester works to assure permitting, harvest plan compliance, and environmental issues are addressed properly. In a procurement role, a forester's primary role is assurance that their market gets the timber or chips from the logger and typically does not oversee the environmental tasks. High accolades to BED foresters who seem to focus on the right tasks given the need to balance compliance to standards while maintaining supply of wood residues. Given my background, it is clear BED foresters clearly know their role in the process.

Noteworthy McNeil System Practices

- a. The Swanton yard receiving system is a success story with recent improvements resulting in a top-notch, well-run yard. Any wood receiving facility that gets delivery trucks in and out quickly will be a preferred delivery destination.
- b. The Swanton yard is required to deliver 75% of the wood residue volume for McNeil by rail. This requires close coordination between the Swanton Yard and McNeil.
- c. The McNeil logger payment process administered by BED appears to be a huge success given discussions with loggers.

BED Harvest Policy Audit Standards (from Appendix A – pages 11 to 17 of the BED RFP 014-25C)

The BED policy standards, *the stated audit question (from the BED RFP)* and **K2QC observations** are noted below.

- A. It will be the policy of BED to accept delivery of whole tree chips only from harvesting operations in Vermont certified by a professional forester as meeting the criteria of “good forestry practice” as outlined below. BED foresters or their authorized agents will conduct periodic on-site inspections to insure compliance with the following practices. Unresolved violations of these practices will result in the termination of chip purchase from the offending producer.

Evaluate whether; 1) harvest sites are periodically inspected, 2) identified issues reach a resolution, and 3) whether unresolved violations result in termination of chip purchasing.

Confirmation of harvest site inspection reports and discussion with BED foresters and loggers support the implementation of this policy. Specific examples were cited to support this policy.

- B. The use of necessary and applicable erosion and sedimentation control practices will be required. Every harvesting contractor will become familiar with the publication AMP’s for Water Quality on Logging Jobs in Vermont. Contractors will be required to implement procedures outlined in the guide to the satisfaction of BED foresters.

Evaluate whether the AMPs are implemented on jobs.

Confirmation of harvest sites and inspection reports, and discussions with BED foresters and loggers support the proper implementation of this policy.

- C. Consideration for visual quality will be required:

1. All refuse will be removed from the landing/logging site prior to termination of the operation. Wood waste will be removed or buried and brush piles leveled to the extent possible.
2. Appropriate techniques will be used adjacent to major hiking trails to protect the integrity of the trail and the hiking experience.
3. Landings will be laid out so as to reduce the adverse visual impact.

Confirm that closeout includes removal of debris and appropriate treatment of woody waste.

Confirmation on inspection reports and discussions with BED foresters support the proper implementation of this policy as stated in 1 and 3. No confirmation on statement 2, as I made no visits to harvest sites adjacent to trails.

- D. Wildlife and fisheries will be given consideration in harvest planning:

1. Landowners will be made aware of any negative impacts to wildlife or fisheries relating to a proposed chip harvest operation on their property.
2. For all sites within Vermont from which wood fuel will be purchased by BED, a BED forester will visit the site with the landowner and/or harvesting contractor and confer in developing a harvesting procedure which meets the forester’s approval.

Demonstrate harvest plan modifications to protect and enhance wildlife and fish habitats.

Significant confirmation on harvest plans and discussions with BED foresters support the implementation of this policy.

- E. Ensure Harvest Notifications include the pertinent information and protection of Deer Wintering Area, Wetlands and Habitats of Rare and Endangered species. When landowner goals require

silvicultural manipulation for wildlife management purposes, guidance may be sought from the Vermont Department of Fish and Wildlife or other qualified source as well as the publication 'A Landowner's Guide to Wildlife Habitat Management for Vermont Woodlands by the Vermont Department of Fish and Wildlife.'

Demonstrate cooperation between BED foresters and VT Fish and Wildlife biologists.

Significant confirmation on harvest plans, visits to harvest sites, and discussions with BED foresters support the proper implementation of this policy.

- F. Protection of fisheries resources will be provided through the use of acceptable erosion and sedimentation control practices including the use of filter strips and protection of streamside shade. Harvesting contractors will be required to implement applicable procedures outlined in the publication Acceptable Management Practices for Maintaining Water Quality on Logging Jobs in Vermont to the extent specified by Burlington Electric Department foresters.

Ensure water quality through the implementation of AMPs on all harvests sites.

Significant confirmation of harvest site inspections and discussions with BED foresters support the proper implementation of this policy.

- G. BED foresters will seek guidance in protecting significant archeological sites.

Ensure significant archeological sites are not disturbed by BED harvesting practices.

Significant confirmation from harvest site inspections and discussions with BED foresters support the proper implementation of this policy.

- H. The development of management goals will involve consideration of the objectives of the landowner and alternatives available to him or her, the characteristics of the site and forest stand, and impacts on related resources (water quality, wildlife, scenic quality, and recreation).

Demonstrate that Harvest Sites meet the above goals.

Confirmation of harvest sites and inspection reports, and discussions with BED foresters support the proper implementation of this policy.

- I. The landowner or land manager and/or the harvesting contractor will confer with a professional forester representing BED in developing a harvesting procedure which meets the forester's approval. In all cases, harvesting will incorporate, to the extent reasonably possible, the protection of residual trees, minimization of waste and assurance of rapid and adequate regeneration. Every effort will be made to put harvested products to their most valuable use.

Residual stand damage will be minimized on BED harvests, wood on harvests is efficiently utilized and silvicultural practices meet accepted standards to establish adequate regeneration.

Confirmation of harvest sites, site inspection reports, and discussions with BED foresters support the proper implementation of minimal post-harvest residual damage. Significant confirmation during harvest site inspections support observations of timber efficiently utilized to highest value markets. Confirmation during post-harvest inspections, harvest plan documentation, and discussions with BED foresters support the proper implementation of silvicultural practices.

- J. Specific types of cutting will include but not be limited to Selection System, Seed Tree System, Shelterwood System, Clearcutting, Improvement Cut and Thinning.

Demonstrate that all BED forestry (i.e., non-development/land conversion) harvests rely on a

sound silvicultural system that is appropriate to the site.

Confirmation of harvest sites, inspection reports, and discussions with BED foresters support the proper implementation of this policy. The clearcutting system is not widely utilized on harvest plans. On a limited basis, BED foresters work with Vermont habitat biologists to prescribe small patch clearcuts for wildlife improvement. I visited two harvest sites that employed land clearing for conversion to agricultural uses.

K. Harvesting contractors are expected to abide by all applicable local, state, and federal regulations.

BED requires and maintains proof of appropriate insurance from suppliers. BED requires suppliers to meet applicable transportation safety and load requirements. BED does not procure wood from contractors who have a record of timber theft or other property destruction or damage.

Discussions with BED foresters support the implementation of this policy.

Afforestation Concerns

In addition to the afore-mentioned harvest policy standards, the BED RFP noted an objective in the scope of work titled ‘Providing qualitative and quantitative assessment of afforestation/deforestation outcomes in areas where wood is harvested for McNeil and the market factors that affect such outcomes.’ The data from 2025 year-to-date timber harvesting notifications in New York and Vermont noted below (provided by Betsy Lesnikoski).

	<u>Notified Plans</u>	<u>Development</u>		<u>Agricultural Conversion</u>	
		Acres	Acres	% of Total	Acres
New York	7,762.9	198.4	2.6%	222.0	2.9%
Vermont	11,768.6	152.6	1.3%	156.1	1.3%

Year-to-date 2025, Vermont has 2.6% and New York has 5.5% of harvest sites using clearing activity for development and agricultural conversion. These activities are relatively minor and may or may not occur without the McNeil market. The McNeil market does not rely on this activity as a major component of wood residues. Most importantly, these sites are not permanently lost to timber production as natural regenerated forests historically prevail as Vermont farms have a rich history of clearing land for agriculture and subsequently letting it regrow naturally.

The vast majority of timber harvests are partial cuts where the natural regeneration process is the method used to cultivate a new forest stand. Plantation management systems, where where land is cleared and trees are planted on short rotations, are generally not employed in the northern forests of upstate New York and Vermont.

Recommendations For Improvement

Training, Advocacy and Reporting

- a. Support logger training through Professional Loggers of the Northeast or another organization with resources to advocate, train and educate loggers on use of Vermont AMP's and New York Best Management Practices.
- b. Encourage annual workshops with a third-party organization to encourage Vermont loggers on effective use of AMP's.
- c. Regularly update BED education materials to assure the public understands the importance of BED's leadership in protection of RTE species and habitat.
- d. Encourage regional development of alternative forestry bioproducts facilities to create additional markets for low-grade wood residues – the Vermont forest is growing volume faster than current removals, which will become a long-term problem if not properly addressed. Healthy, well-managed forests are the goal to optimize forest carbon sequestration and storage.
- e. Advocate for pragmatic improvements to Vermont's ACT 250. The law has a good foundation, yet it needs to evolve and change with the demands of Vermont's public and rural culture.
- f. Support SLoCAMP (Supporting Loggers Compliance with AMP's), a grant-funded cost-share program to support Vermont loggers in implementing initiative-taking water quality protection practices on their harvest sites. The program is funded by the Vermont Department of Forests, Parks and Recreation and administered by the Professional Logging Contractors of the Northeast.
- g. Consider chain of custody processes to improve verification of chip supply and origination of wood residues.
- h. Consider a trip ticket policy for all loads of timber or wood residues transported from the woods or mill to a wood using facility to ensure site-to-site or site-to-mill timber security.

Harvesting Policy

A review of the BED Harvesting Policy for Whole Tree Operations in Vermont is one of the outcomes in the RFP. The policy is a pragmatic document that covers a wide range of extremely important aspects of harvest planning and implementation.

In my process of reviewing documents pertaining to BED's policies, I reviewed the 2013 report by Pricewaterhouse Coopers which used the 2010-2014 SFI standard to identify gaps in the BED process of procuring wood residues for McNeil. Although there were many similar conclusions as mine, I wanted to highlight more specific actions to improve clarity of the BED Harvesting Policy.

Recommendations To Improve BED's Harvesting Policy for Whole Tree Chipping Operations in Vermont

- a. Improve the overall quality of the BED Harvesting Policy document using a graphic designer or publisher program to enhance readability and the professional appearance. The text of the document is technically clear and professional (other than minor improvements noted below); however, the appearance of the document could use some improvement.
- b. Section 1 – Require annual review/education of Vermont AMP's for all loggers in the BED system. The Professional Logging Contractors of the Northeast could be a good resource to lead a training session.
- c. Section 2a – Define refuse. Require all refuse be removed as soon as practicably possible, especially during winter months when snow and ice can prevent clean-up at season end. At a minimum, require weekly clean-up of refuse.

- d. Section 2c – Add revegetation of landings with grass or natural vegetation within one year.
- e. Section 5b – Reword ‘every effort will be made to put harvested products to their most valuable use’ to ‘timber removed from the designated harvest plan will be utilized to the maximum possible value’.
- f. Section 7 – Reword to state ‘BED foresters will encourage landowners to utilize a stumpage sale contract detailing harvest plan, stand prescriptions, and a list of markets with stumpage prices paid to the landowner’.

Other Observations Addressing Public Concerns

- a. The public has a genuine interest in forest management and desires exemplary work from BED certified harvest plans. As stated earlier, the harvest plan documentation used by BED foresters sets a standard for non-public lands in the Northeast US. The detailed planning and collaboration with State of Vermont Natural Resource Managers is noteworthy, exemplary, and progressive.
- b. The McNeil system receives wood residues from many sources. During my field visits, I observed no chipping of large diameter sawlogs or whole trees that could be sold to higher use roundwood markets. Loggers have no financial incentive to sell or ship timber that could be sold for a higher return.
- c. Land in the Northeast is regularly cleared for farming, housing, or development, especially near farms and larger communities. Vermont has a rich history of balancing farming, sugarbush lands, timber management, and rural communities. Neighboring states admire this balance of public demands. Without a wood residue market, the residues from site conversions would be open burned, which would directly release carbon the atmosphere and avoid use as a power source.
- d. Public comments from the June 24, 2025 TEUC meeting stated that 72% of wood produced in Vermont is burned. I cannot locate any public data that supports the statement. Timber produced in Vermont is sold to over 40 markets from sawlogs to pulpwood to firewood to wood residues. Historically, Vermonters burn wood to heat their homes and generate heat for their sugarbush operations – the use of wood for heat is a source of pride and a fabric of the rural society.

Photos of Active Harvest Sites – Summer 2025 (by John Bryant)

Photo 1: Sorting roundwood from limbed tops



Photo 2: Processing firewood on the logging yard



Photo 3: Piled tops from a winter job ready for chipping



Photo 4: Old fashioned firewood processing on site



Photo 5: Sorting roundwood from wood residues



Photo 6: Large pile of tops prepared for chipping



Photo 7: White Pine sawlogs ready for shipment



Photo 8: Truck loaded with wood chips



Photo 9: High quality hardwood crop trees post-harvest



Photo 10: Multiple wood products utilized for high value markets



Photo 11: Swanton yard wood chip receiving station



Photo 12: Tops and limbs piled for chipping



Exhibits Reviewed for This Report

- a. RFP 014-25C – BED Request for Proposal – Forestry Assessment and Analysis for McNeil.
- b. Vermont Acceptable Management Guidelines – Manual for Logging Professionals 2019.
- c. Burlington Electric Department – Harvesting Policy for Whole Tree Chipping Operations in Vermont (provided by Betsy Lesnikoski).
- d. Burlington Electric Department – Making A Harvest Plan (provided by Betsy Lesnikoski).
- e. Detailed lists of active 2024 and 2025 Vermont and New York harvest plans and maps under the McNeil certification system by BED Foresters (provided by Seth Clifford).
- f. Northern Woodlands article on Forest Carbon (summer 2025 edition).
- g. Innovative Natural Resource Solutions LLC report on BED’s Biomass Fuel Procurement Assessment (dated June 2016).
- h. Innovative Natural Resource Solutions LLC report on 2023 McNeil Economic Impact Analysis (dated June 2023).
- i. A Guide to Forest Carbon in the Northeast authored by Alexandra M. Kosiba, UVM 2024.
- j. McNeil Operation Certificate Permit dated September 14, 1981 (provided by Betsy Lesnikoski)..
- k. McNeil Operation Certificate Amended Permit dated May 16, 1983 (provided by Betsy Lesnikoski).
- l. BED analysis of 2019 annual purchases compared to net growth (provided by Betsy Lesnikoski).
- m. McNeil system volume delivery summary report for 2022 to 20245 (provided by Betsy Lesnikoski).
- n. Price Waterhouse Coopers report on the BED McNeil Station – SFI Standard Gap Assessment report (dated April 29, 2013).
- o. Maine Woodland Owners article on Silviculture and Carbon Sequestration authored by Bob Seymour dated April 2021.
- p. A Landowners Guide – Wildlife Habitat Management for Lands in Vermont published by Vermont Fish and Wildlife Department (dated 2014).
- q. Northern Woodlands magazine article on New Forest Bioproducts as A Conservation Tool (Summer 2025 edition).
- r. State of Vermont ACT 250 Program and History (from vermont.gov/act250-program website).
- s. TEUC forum discussion and notes from June 19, 2023 public meeting.
- t. TEUC forum notes from August 22, 2024 public meeting.
- u. TEUC meeting notes from June 24, 2025 public meeting.
- v. City of Burlington contract with K2QC Consulting LLC (dated May 2, 2025).
- w. K2QC Consulting LLC proposal for Forestry Assessment and Analysis for McNeil (dated February 18, 2025).

Qualifications, Experience and Education – John Bryant

- a. Retired Northeast Region Manager and Co-owner – American Forest Management (national forestry consulting company) – responsible for client relations and leadership of twenty-eight employees in 2 office locations and 3 timber processing yards in Maine (October 2007 to December 2019).
- b. Owner – K2QC Consulting LLC since January 2020 (forest management, timber value assessment, logger business assessment, and organizational development work).
- c. 42 years' experience as forester and land manager in Maine and New Hampshire for St. Regis Paper Company, Champion International Corporation, International Paper Company, and American Forest Management.
- d. Region Manager – Champion International Corporation, and International Paper from February 2000 to September 2007 – responsible for management of company owned lands and leadership of thirty-five employees in 4 office locations in Maine.
- e. From 2005 to 2019, responsible for managing annual deliveries and quarterly negotiations for an annual fiber supply agreement on 1,100,00 acres of timberland between Verso Paper [and pre-successor mill owner International Paper] and landowner BBC Lands [and pre-successor landowner GMO Renewable Resources]. The annual fiber supply volumes totaled 800-000 tons in 2005 and were amended in later agreements due to mill requests, timber markets, and mill closures.
- f. Manager Land Transactions – Champion International Corporation (April 1996 to January 2000) – responsible for land sales and acquisitions in Maine and northern New Hampshire including lead negotiator for a 22,000-acre Niatous Lake conservation easement between Robbins Lumber Company, Forest Society of Maine, State of Maine, and partner conservation organizations.
- g. Internal Consultant (part-time) – Champion International Corporation from 1990 to 2000 – working with management and work teams to improve team participation and improve company collaborative culture.
- h. Forester in various land management and silviculture positions at St. Regis Paper Company and Champion International Corporation from May 1977 to March 1996, including 8 years as a Field Forester.
- i. Maine Licensed Forester #931 (1982 to present).
- j. 1977 B.S. Forest Utilization degree from University of Maine, Orono.
- k. Advisory Committee Member, Scientific Forest Management Area, Baxter State Park (2014 to present).
- l. Co-Chair, FOR/Maine Executive Committee (2023 to 2025).
- m. Town of Holden Planning Board (1993 to 2014)
- n. President, Holden Land Trust – Holden, Maine (2022 to present).

Respectfully submitted,

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