

**AMENDMENTS TO VERMONT CO2 BUDGET TRADING PROGRAM REGULATIONS:
SUMMARY OF COMMENTS AND RESPONSES**

August 26, 2013

List of Commenters

1. Northeast Energy Efficiency Partnerships (NEEP)
2. American Chemistry Council (ACC)

Summary of Comments and Agency Responses

Note: The Commenter is identified by the number in the parentheses following the comment.

1. **Comment:** The proposed amendments will help Vermont continue to reduce its CO2 emissions while promoting energy efficiency and affordability. (1)

Response: The Agency acknowledges the comment and appreciates the support for the rule amendments.

2. **Comment:** The Commenter notes that Vermont has not yet adopted the energy performance requirements of the 2012 International Energy Conservation Code (IECC) and encourages the Agency to revise the proposed amendments to Vermont's CO2 Budget Trading Program Regulations to implement multiple levels of compliance for energy efficiency building practices as CO2 emission offset projects (e.g., an appropriate level of offset credits for homes achieving the 2012 IECC, 2012 IECC plus 15%, and 2012 IECC plus 30%). (2)

Response: To obtain offset credits for end-use efficiency, the updated RGGI model rule and Vermont's proposed amendments to the Vermont CO2 Budget Trading Program Regulations require residential buildings to exceed the energy performance requirements of the IECC 2012 by 30 percent; commercial buildings are required to exceed the energy performance requirements of ASHRAE Standard 90.1-2010 by 30 percent; and multi-family residential buildings classified as commercial by ASHRAE Standard 90.1-2010 are required to exceed the energy performance requirements by 20%. A key tenet for awarding CO2 offset allowances is to ensure that the allowances awarded represent CO2 equivalent emission reductions that are real, additional, verifiable, enforceable and permanent. Many of the states participating in RGGI have already adopted the energy performance requirements of IECC 2012 and/or ASHRAE Standard 90.1-2010. It is the intention of the Vermont Department of Public Service to adopt the IECC 2012 during 2014, the year in which the proposed amendments will take effect. Thus, awarding offset credits for homes achieving the IECC 2012, as the

Commenter suggests, would not provide any additional CO2 emission reductions once Vermont adopts the IECC 2012. Moreover, maintaining the language as proposed (e.g., IECC plus 30%) is consistent with the updates to the RGGI model rule and will ensure that any offset credits generated in this category in Vermont are accepted by the other states participating in RGGI.