

**STATE OF VERMONT  
PUBLIC UTILITIES COMMISSION**

Case No. 24-2797-PET

Petition of Vermont Renewable Gas, LLC for )  
a certificate of public good, pursuant to 30 )  
V.S.A. § 248, to construct and operate a 2.2 )  
MW generation facility in Lyndon, Vermont )

April 21, 2026

**SECOND SUPPLEMENTAL TESTIMONY OF**  
**EVAN DELL'OLIO ON BEHALF OF**  
**VERMONT RENEWABLE GAS, LLC**

Mr. Dell'Olio's testimony addresses harvesting procedures and procurement as referenced in 30 V.S.A. § 248(b)(11)(C) .

Exhibit VRG-ED-2<sup>nd</sup> Supp-1 : VRG Wood-Chip Procurement & Harvesting Plan ("VRG Harvesting Plan")

1 **Q1: Please state your name and position relative to this Petition.**

2 A1: My name is Evan Dell'Olio. I am a Manager of Vermont Renewable Gas, LLC, ("VRG")  
3 a Vermont limited liability company with its principal place of business at 145 Pine Haven  
4 Shores Road #1000A Shelburne, Vermont 05482. VRG intends to construct and operate an  
5 electric generation ("the Project") in the Saint Johnsbury – Lyndon Industrial Park in  
6 Lyndon, Vermont. The owners of VRG, are my company Synergy Bioproducts Corporation  
7 (Synergy Bioproducts), a Vermont corporation with its principal place of business also at  
8 145 Pine Haven Shores Road Shelburne, Vermont 05482 and CETY Capital, LLC (CETY  
9 Capital), a wholly owned subsidiary of Clean Energy Technologies, Inc. (CETY), a Nevada  
10 Corporation with its principal place of business at 1340 Reynolds Ave. #120 Irvine, CA  
11 92614. I am the founder and principal shareholder of Synergy Bioproducts Corporation.

12 **Q2: Please describe your qualifications and experience.**

13 A2: I earned a Bachelor of Arts Degree from Saint Anselm College in Manchester, New  
14 Hampshire as well as a degree of Juris Doctor from Suffolk University in Boston,  
15 Massachusetts. In the beginning of my career, I worked for a United States Senator. Since  
16 that time, I have primarily spent my career in the clean energy and renewable natural  
17 resources sectors. In 2023 my company Synergy Bioproducts formed VRG as a joint  
18 venture with CETY's CETY Capital subsidiary to develop a farm methane project. We have  
19 chosen to develop, construct, and operate this project in Lyndon, Vermont. The intent is for  
20 this project to support Vermont's long-term renewable energy and climate goals, build upon  
21 the state's working lands economy, and support environmental stewardship in Vermont.

1 This project is similar to other projects CETY and its partners have developed in Europe  
2 to generate heat and/or electricity.

3 **Q3: Have you already submitted prefiled testimony in this matter?**

4 A3: Yes, I submitted prefiled testimony in support of the petition when first filed on August 26,  
5 2024. I also submitted prefiled testimony related to Criterion (b)(4), Economic Benefit to  
6 the State, on November 3, 2025.

7 **Q4: What is the purpose of this second supplemental testimony?**

8 A4: The purpose of this second supplemental testimony is to introduce Exhibit VRG-ED-2<sup>nd</sup>  
9 Supp-1, entitled VRG Wood Chip Procurement and Harvest Plan (“VRG Harvest Plan”).  
10 This document was prepared in response to a request from the Vermont Agency of Natural  
11 Resources (“ANR”), and is submitted based upon a joint determination by VRG and ANR  
12 that the Project is required to meet the requirements of 10 V.S.A. § 248(b)(11)(C). This  
13 determination stems from the decision by the Commission that the Project does not qualify  
14 for treatment as a “farm methane facility” as originally proposed. For this reason, the  
15 Project should be treated as an “in-state generation facility that produces electric energy  
16 using woody biomass”. Consequently, under criterion (b)(11)(C), the Project is required to  
17 “comply with harvesting procedures and procurement standards that ensure long-term  
18 forest health and sustainability . . . . consistent with the guidelines and standards developed  
19 pursuant to 10 V.S.A. § 2750 (harvesting guidelines and procurement standards) when  
20 adopted under that statute.” ANR has adopted harvesting guidelines pursuant to 10 V.S.A.  
21 § 2750 titled “Voluntary Harvesting Guidelines for Landowners in Vermont” (“VHG”) dated  
22 January 2015.

1 **Q5: How does VRG intend to comply with ANR's Voluntary Harvesting Guidelines?**

2 A5: VRG has prepared the document titled *VRG Wood Chip Procurement and Harvesting Plan*  
3 ("VRG Harvesting Plan") and attached to this testimony as Exhibit VRG-ED-2<sup>nd</sup> Supp-1.  
4 This document was drafted with the purpose of demonstrating to ANR and the Commission  
5 that VRG's procedures and standards are consistent with the guidelines and standards that  
6 ANR has established pursuant to 10 V.S.A. § 2750. The VRG Harvesting Plan has also  
7 been developed to ensure that all forest-derived wood chips supplied to VRG are sourced  
8 consistent with the Biomass Renewable Energy Standard (BRES), Tier II sourcing  
9 standards as discussed in my prefiled testimony dated August 26, 2024 at pages 4-5.

10 **Q6: What types of woody material proposed to be used by VRG in the Project will be**  
11 **subject to the proposed VRG Harvesting Plan?**

12 A6: All persons delivering forest-derived chips to VRG whether they be sourced from  
13 chipped tops, limbs, low-grade roundwood, and other residues from timber harvesting  
14 must comply with this document. Wood delivered to VRG from other sources including  
15 orchards, Christmas tree farms, maple sap operations, and dedicated energy growers will  
16 not be subject to the VRG Harvesting Plan.

17 **Q7: What are the minimum standards which VRG will require wood chip suppliers to**  
18 **meet under the proposed VRG Harvesting Plan?**

19 A7: VRG will require all wood chip suppliers to implement Vermont's Acceptable  
20 Management Practices (AMPs) for water quality on all logging jobs. Suppliers will be  
21 required to identify and protect sensitive areas, specifically wetlands, streams, riparian  
22 buffers, deer wintering areas, and state-ranked S1/S2 natural communities using available

1 GIS and ANR guidance. Suppliers will also be required to incorporate practices that  
2 minimize litter-layer disturbance, retain stumps/roots and retain sufficient woody debris  
3 (including down woody material in stream buffers and other retention areas) to sustain soil  
4 productivity and habitat. The amount and distribution of retained material will be  
5 determined on a harvest-specific basis by the forester of record. Suppliers will employ  
6 harvesting practices that maintain adequate residual stocking, species composition, and  
7 structural diversity to support natural regeneration and long-term forest productivity,  
8 consistent with UVA standards and professional forestry practice. At the close-out of  
9 harvests, suppliers will additionally be required to the extent consistent with existing UVA  
10 forest management plans for the land being harvested, close-out roads, trails, and landings.  
11 To the extent consistent with UVA forest management plans as well, openness to adjust  
12 practices as new science or site conditions warrant will be encouraged. VRG will actively  
13 promote a diversification of wood suppliers from within the project woodshed to reduce  
14 concentration risk and support regional forest health. Considering visual impact mitigation,  
15 to the extent consistent with UVA forest management plans, VRG's will encourage harvest  
16 layouts and retention strategies that mitigate visual impacts along public roads, trails, and  
17 recreational areas, consistent with the VHGs. Furthermore, no wood will be procured from  
18 land conversion operations. The VRG Harvesting Plan also asserts that FIA growth-versus-  
19 removals data for the projected woodshed shows annual forest growth exceeding  
20 removals by approximately 674,000 green tons confirming that anticipated project  
21 removals are well within sustainable regional limits. The project will consume +/- 25,000  
22 green tons of low-grade wood chips.

1 **Q8: What are the categories of land from which wood may be sourced for the project?**

2 A8: For wood sourced from forestland in Vermont, suppliers must satisfy one of two  
3 pathways. First, wood from forestland enrolled in Vermont's Use Value Appraisal  
4 (UVA or Current Use) Program will qualify for delivery to VRG. Secondly, if land is not  
5 enrolled in UVA, a Vermont licensed forester may certify that the harvest area from  
6 which the wood was produced complies with the UVA Management Plan standards  
7 applicable to the harvest. Furthermore, the forester will certify that all Vermont AMPs for  
8 Logging Jobs are followed and that other applicable Vermont forestry-related laws are  
9 satisfied. For wood sourced from forestland from New Hampshire or other jurisdictions  
10 outside Vermont, a licensed or SAF certified forester must certify in writing that the  
11 harvest area that is producing the wood feedstock complies with Vermont UVA  
12 Management Plan standards applicable to the harvest; and that all applicable state and  
13 local forestry and water quality related laws within the relevant jurisdiction are followed.

14 **Q9: Are there additional harvest standards by which suppliers must adhere to when**  
15 **supplying wood chips to VRG?**

16 A9: Yes, there are additional harvest standards, and they may be found in Section 3 of the VRG  
17 Harvesting Plan. For example, licensed foresters will use their best professional  
18 judgement when incorporating down woody material (DWM) and legacy features – snags,  
19 cavity trees, and large-diameter legacy trees into a harvest site. The forester of record shall  
20 also plan to retain and distribute woody material across the site consistent with the  
21 Vermont Harvesting Guidelines (VHG) §4.3 guidance and any existing UVA forest  
22 management plans. Stumping of harvest sites will be prohibited under VRG supply

1 contracts. The forester of record shall also identify and plan for the retention of snags,  
2 cavity trees, and legacy trees prior to commencing harvest operations, consistent with any  
3 existing UVA forest management plans. Existing coarse woody material – particularly  
4 large (18 inches or greater in diameter), hollow, or rotten logs and rotten stumps – shall be  
5 avoided and protected during logging and cleanup operations, consistent with any UVA  
6 forest management plans. Harvest documentation, specifically a Harvest Information Sheet  
7 (HIS) (attached as Appendix A to the VRG Harvesting Plan) includes a DWM and legacy-  
8 feature attestation signed by the relevant timber harvester addressing: i) whether low-  
9 fertility or sensitive site conditions are anticipated to warrant enhanced DWM retention; ii)  
10 any planned snag/cavity tree retention approach, and iii) whether any legacy trees  
11 exceeding 24 inches DBH are likely to be removed, and if so the silvicultural or safety  
12 basis.

13 Furthermore, VRG recognizes that Vermont's old forests are rare and ecologically  
14 irreplaceable resources, as described in VHG §5.5. A licensed forester of record shall  
15 identify whether old-forest conditions and characteristics are present within a proposed  
16 harvest area prior to commencing operations consistent with any existing UVA  
17 management plans. The VRG Harvesting Plan promotes identification of old-forest  
18 characteristics, encouragement of small reserves or harvest rotation extensions in old forest  
19 stands (consistent with VHG §5.5), communication of harvest avoidance in areas of old-  
20 forest conditions, delineation of areas with old forest-conditions, and addressing whether  
21 old-forest indicators are present in each HIS. Additionally, the VRG Harvesting Plan  
22 residue retention and equipment restrictions may be appropriate on low-nutrient or

1 sensitive sites as determined by each forester of record and consistent with UVA  
2 Management Plan superscriptions. VRG also aligns with the State of Vermont's emphasis  
3 on sustained forest productivity and adaptive management, including addressing climate-  
4 related stressors consistent with the Voluntary Harvesting Guidelines §6.1.

5 **Q 10: What are the types of record keeping requirements which VRG will require?**

6 A10: VRG will require standardized documentation for all supply contracts. These  
7 documents will be retained for a minimum of four (4) years. An HIS will provide detailed  
8 information about the harvest site such as location, harvest type, dates, forester of record,  
9 AMP compliance, sensitive-area screening, UVA parcel information, and a forester  
10 certification (See Appendix A). Verification evidence of the pathway for wood sourced  
11 within Vermont (UVA vs. non-UVA) or equivalent third-party certificate with  
12 equivalency documentation (for land located outside of Vermont) will need to be  
13 provided. A statement that a harvest is not a land conversion, consistent with the BRES  
14 requirements will also be provided. A forester certification will also be provided to  
15 VRG as part of each HIS that certifies that harvesting of wood resources producing wood  
16 feedstock delivered and consumed by VRG adheres to the procurement standards within  
17 Section 2 of the VRG Harvesting Plan.

18 **Q11: What are the roles and responsibilities of the various parties involved in harvesting  
19 and supplying loads of wood chips?**

20 A11: The responsibilities of the parties are as follows: (1) VRG has set procurement standards,  
21 will review and retain documentation for the minimum 4 years, maintain traceability, and  
22 report compliance to ANR and PUC as required; (2) Timber harvesters of record for reach

1 harvest are will ensure that they comply with the procurement requirements of Section 2  
2 of the VRG Harvesting Plan, gather and submit all required documentation through the  
3 HIS, maintain traceability, and notify VRG of any material changes in harvest plans or  
4 parcel statuses; (3) Licensed Foresters of record will execute harvests consistent with UVA  
5 Management Plan standards, AMPs, and applicable VT forestry laws; provide written  
6 certification via the forester certification included in the HIS, and advise on site-specific  
7 protections including DWM, stocking, and regeneration; and (4) ANR and its Department  
8 of Forest Parks and Recreation (FPR) will provide guidance on sensitive resources when  
9 identified, conduct county forester compliance inspections on UVA-enrolled parcels, and  
10 review VRG compliance filings.

11 **Q12: Will VRG update its Harvesting Plan?**

12 A12: Yes, VRG will conduct annual check-ins with ANR and key partners to inform updates  
13 to the VRG Harvesting Plan to ensure that they remain consistent with the AMPs, UVA  
14 standards, the BRES, or state guidance. VRG will furthermore encourage suppliers to be  
15 LEAP or Master Logger certified or partake in an equivalent professional program. VRG  
16 will update the HIS and its contract language with suppliers and guidance evolves  
17 including any finalized FPR procurement standards under 10 V.S.A. §2751. Additionally,  
18 every ten (10) years from the date of the facility's commissioning, VRG will review FIA  
19 growth-versus-removals data for the project woodshed and update its regional  
20 sustainability assessment.

21 **Q13: Are there specific responsibilities for compliance associated with each party within**  
22 **VRG's wood chip sourcing system?**

1 A13: Yes, if a timber harvester supplying wood chips to VRG does not adhere to one or more  
2 required criteria items within the VRG Harvesting Plan; they will be given written notice  
3 of their failure to comply and a copy of such notice will be provided to the forester of  
4 record. If a timber harvester fails to adhere to one or more criteria items within the VRG  
5 Harvesting Plan for a second time, the timber harvester will be given notice of its failure  
6 to comply and a copy of such written notice will also be provided to the forester of record.  
7 The timber harvester and forester will be required to agree to a remediation plan with VRG  
8 after such second occurrence before any further wood chip deliveries may be made to  
9 VRG. If a timber harvester fails to adhere to one or more required criteria items for a  
10 third time, VRG will notify the timber harvester that they are prohibited from providing  
11 further deliveries of wood chips to VRG. As for foresters, if a forester of record fails to  
12 provide VRG with a signed forester certification as part of a submitted HIS after the close  
13 of a harvest, VRG may provide written notice to the forester addressing their failure to do  
14 so. If the forester fails to provide a forester certification as part of an HIS within thirty (30)  
15 days after receiving written notice from VRG, they may be prohibited from providing future  
16 deliveries of wood-chips to VRG.

17 **Q14: Does this conclude your testimony?**

18

19 A14: Yes

*Evan B. Dell'Olio*  
Evan Dell'Olio

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MW generation facility in Lyndon, Vermont )

**DECLARATION and ATTESTATION OF EVAN DELL'OLIO**

I declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Ludlow, Massachusetts this 21st day of April, 2025.

*Evan B. Dell'Olio*

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Evan Dell'Olio