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Sen. Anne Watson, Chair
Senate Committee on Natural Resources and Energy
Vermont State House, Room 8
Montpelier, VT 05633-5301

H.740 (Fuel Dealer Registry)

Dear Chair Watson and Committee Members,

The National Federation of Independent Business (NFIB) represents more than 800 small businesses in Vermont. Our members operate in every industry - from family farms to main street shops - and are typically very small, with 90% employing fewer than 20 people.

We write to share our members' concerns with H.740, which directs the Agency of Natural Resources (ANR) to establish a fuel dealer registry as part of the state's greenhouse gas inventory. This proposal poses regulatory, privacy, and cost concerns for small businesses.

Many fuel dealers are small local businesses for whom new regulations pose a much more substantial burden compared to large corporations. Most small business owners do not have in-house legal and compliance staff to help them navigate government regulations. As such, regulations cost small businesses substantially more (60%) than larger businesses.¹

Further, data on state-level fuel consumption and cost is widely available from both government and private sources.² Additional data collection is redundant and raises privacy concerns for suppliers and customers. In its current form, H.740 does not explain how this data would be used, whether ANR could demand customer-level data from suppliers, and to what extent the data would be made public.

Making customer-specific fuel consumption data public intentionally or as a result of a breach may reveal sensitive and proprietary information about business cycles, machinery, and manufacturing processes that could disadvantage a small business. That risk grows if the data is shared with third parties.

Even supplier-specific aggregate data enhances the risk of competitive harm. In small markets, de-identified or aggregated data at the supplier level could be linked back to a specific customer or group of customers.

¹ Crain, Hopkins, "The Impact of Regulatory Costs on Small Firms," U.S. Small Business Administration, October 2001.

² See, e.g., [U.S. Energy Information Administration's Vermont Profile](#) and [Vermont Transportation Energy Network](#).

Finally, our small business owner-members strongly oppose mandates like the Clean Heat Standard, Low Carbon Fuel Standards, and other cap-and-trade systems that make energy bills more expensive. These mandates will raise net energy costs and deepen Vermont's affordability crisis.

In a report last year that examined existing cap-and-trade systems, the Vermont Treasurer warned of immediate and steep increases in fuel prices if the state joined the Western Climate Initiative (WCI).³ By 2038, the WCI would add up to 69 cents per gallon of gasoline and 82 cents per gallon of diesel.

The Treasurer's report recommended against joining the WCI and waiting for more details about New York's "cap-and-invest" program under that state's greenhouse gas reduction law, which shares many similarities with the Vermont Global Warming Solutions Act.

A recent memo from the New York State Energy Research and Development Authority (NYSERDA) reveals that option would impose even steeper costs.⁴ By 2031, NYSERDA reports:

- total energy costs for upstate NY households would increase by more than \$4,000,
- the average small business would see energy bills rise by \$7,000, and
- the price of gasoline and diesel would increase by more than \$2.20 per gallon.

The New York Attorney General's Office said meeting the state's greenhouse gas emission reduction mandate "would require imposing extraordinary and damaging costs upon New Yorkers" and is "not practically feasible due to costs consumers simply cannot bear."⁵

Thank you for the opportunity to comment and for considering our members' perspective.

Sincerely,



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³ Vermont Treasurer, "Report Pursuant to Act 148 of 2024," 2/8/2025

⁴ NYSERDA, "Likely Costs of CLCPA Compliance," 2/26/2026

⁵ New York State Office of the Attorney General, Memo to the Court re *Matter of Citizen Action of New York, et al. v NYS Department of Environmental Conservation*, August 11, 2025.