



**State of Vermont**

Agency of Natural Resources – Office of Planning & Policy  
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*Agency of Natural Resources*

February 2, 2018

Judith Whitney, Clerk  
Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620-2701

Re: Case No. 17-5257-INV - review of the standard-offer program

Dear Ms. Whitney,

The Agency of Natural Resources (Agency) thanks the Public Utility Commission (Commission) for convening the above referenced investigation and for the opportunity to provide initial comments.

The Agency has reviewed and supports the Department of Public Service's (Department) comments in this matter, filed on January 31, 2018. The Department offered a thorough and thoughtful response to the six questions set forth in the Commission's order. Therefore, the Agency offers the following general goals we believe the Commission should prioritize for any future version of the standard-offer program:

**Maximize greenhouse gas reduction benefits**

The standard-offer program should support technologies that provide the best greenhouse gas reduction benefits, as compared to alternatives that may be deployed otherwise as a result of net-metering or RES compliance; this may include certain battery storage solutions.

**Leverage multiple public policy benefits**

The Commission should explore whether the standard offer program can be used to further multiple public policy benefits, such as addressing water quality in Lake Champlain and advancing the state's universal recycling goals by allowing an appropriate fuel mix for non-farm anaerobic digesters.

**Well vetted bids/Deadlines that result in success**

The standard-offer process should sufficiently vet projects prior to bid submission, so that a higher percentage are ultimately commissioned. And once a bid is selected, a process that provides sufficient time between awarding bids and the required commissioning date, in order to investigate and resolve any substantive issues, including impacts to natural resources.

Thank you,

  
Billy Coster  
Director of Planning