



## Washington Electric Cooperative, Inc

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*Filed by ePUC*

September 4, 2018

Judith Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620-2701

Case No. 17-4632-INV: Washington Electric Coop 2017 Demonstration of Compliance Filing  
Revised Filing

Dear Ms. Whitney:

I has come to our attention that Renewable Energy Certificates associated with power from the New York Power Authority should have been less than the values reported in WEC's August 31, 2018 filing. Please find updated numbers below and in the excel file used to report RECs. Revisions are highlighted in yellow.

Washington Electric Co-op (WEC) provides its compliance filing report for the 2017 Renewable Energy Standard (RES) for Tiers I, II, and III.

**Tier I** – To meet Tier I WEC was required to provide total renewable energy in the amount of 55% of retail sales to meet its Tier 1 obligation. WEC's retail sales in the year 2017 totaled 68,821,561 kWh making its Tier I requirement 37,851,859 kWh.

WEC retained Vermont Tier 1 qualifying RECs totaling 72,527,000 kWh. Therefore, WEC not only met the Tier 1 requirement of 55%, but it far exceeded it. In fact, WEC had extra renewable power to meet 100% of its retail sales with renewable power and a little bit extra as well. WEC was 100% renewable with excess RECs of 3,705,000 kWh.

WEC plans to retire its excess 2017 renewable energy REC's above 100% of its retail load (3,705,000 kWh) for a future compliance period. WEC notes the PUC order in Docket 8550 allows 3 years to use excess RECs. Therefore, WEC seeks to use the excess above retail load during the period 2018, 2019 or 2020. Please see the table and data below for a summary of WEC's resources and Tier 1 compliance (see Exhibit 1 for details).

**Tier II** – In docket 8714, the PUC determined WEC qualified as a 100% renewable provider under 30 VSA § 8005 (b)(1)(A). As a result, WEC’s compliance for Tier II requires it provide its members with a net metering program and accept net metering systems. Please note there is no volumetric energy requirement for Tier II as a 100% renewable provider. WEC must only offer a PUC approved net metering program to members. WEC not only ran a successful PUC approved net metering program and complied with the RES Tier II requirements, but it had 907.57 kW installed on its electric system which was a record year. See Exhibit 1 for details.

Had WEC not qualified as a 100% renewable provider, its Tier II requirement would have been 1% of retail sales being met with net metering distributed generation installed in calendar year 2017 or 688,206 kWh. WEC had 131 installations totaling 907.57 kW coming on line during the compliance year.

**Tier III** - WEC’s 2017 Tier III compliance requirement is 2% of retail sales or 1,376,431 kWh. Through its Button Up program, run in conjunction with Efficiency Vermont and its weatherization effort with Capstone Community Action (Capstone), WEC achieved savings of 1,406,000 kWh in the 2017 compliance year. Please see Exhibit 2 for details.

The 2017 Button Up program has four end use measures addressing water heat and home heating. In this component of program offerings, WEC shares savings with Efficiency Vermont (EVT). WEC and EVT incentives are paid to participating WEC members and WEC supplements specific measures with additional incentives above what is provided by EVT. Measures included in the Button Up program were approved by the Technical Advisory Group (TAG).

The second area of savings includes thermal energy savings through a partnership with Capstone Community Action, of Barre Vermont. WEC and Capstone collaborate for income eligible WEC member households to participate in the Weatherization Assistance Program (WAP), administered by Capstone and through an agreement between WEC and Capstone. WEC converts thermal energy savings using the RES mandated EIA conversion factor for 2017 into MWh equivalence. Savings under this part of WEC’s efforts was approved by the PUC in order issued on August 24, 2018.


The third area of savings includes prescriptive energy savings as approved by the Technical Advisory Group (TAG) for Type II electric vehicle (EV) charging stations, which were enabled by a VLITE grant to WEC.

The fourth area includes prescriptive energy savings as provided by TAG for EVs; these EVs were purchased by WEC members in 2017 through promotions sponsored in part by WEC and other distribution utilities.

The PUC issued an order on August 24, 2018 regarding WEC's Tier III Savings claims for weatherization work completed by Capstone Community Action. In that order the PUC approved WEC's 580 MWH claim for savings and noted that WEC must provide proof of payment to Capstone for the savings claimed as part of its filing demonstrating compliance with all Tiers of the RES, which is due no later than August 31, 2018. Please see Exhibit 3. WEC issued a check and has delivered that check to Capstone.

WEC appreciates the opportunity to respond and for your consideration in this matter. If you need additional information do not hesitate to contact us.

Sincerely,



Patricia H. Richards  
General Manger

## **Exhibit 1: WEC Tier I and II Summary**

<b>2017 WEC Sources of Power</b>					
Resources (kWh)	Type	kWh	Percent of RTLO	Percent of Retail Load	Percent of Total Resources
Wrightsville (Small Hydro)	Hydro	2,852,391	4%	4%	3%
Coventry Clean Energy Corp (Landfill Gas)	Landfill Methane	53,075,555	70%	77%	64%
Market Purchase	ISO-NE System Mix	1,968,000	3%	3%	2%
NYPA - Niagara (Large Hydro)	Hydro	11,413,011	15%	17%	14%
NYPA - St. Lawrence (Large Hydro)	Hydro	277,580	0%	0%	0%
Ryegate (Wood)	Wood	2,237,071	3%	3%	3%
VEPPI Hydro (Small Hydro)	Hydro	1,824,077	2%	3%	2%
Sheffield Wind (Wind)	Wind	9,144,771	12%	13%	11%
<b>Total</b>		<b>82,792,456</b>	<b>109%</b>	<b>120%</b>	<b>100%</b>
WEC Member Net Metering (kWh)	Solar	2,069,794	3%	3%	2%
Load at ISO-NE (RTLO) + Internal Generation kWh	75,787,061				
Load Retail Sales kWh	68,821,561				
2017 Tier 1 RES Compliance Requirement	55%				
Tier 1 kWh Required	37,851,859				
<b>RECs Used for Tier 1 (2017 Actual)</b>					
Misc Other (ME Hydro, Wrightsville) (kWh)	60,863,000				
NYPA Contract RECs (kWh)	11,664,000	revised 9/4/2018 to account for reduction in St Lawrence RECs			
Total RECs (kWh)	72,527,000				
Excess (Short) kWh	3,705,439	can use these as banked for year 2018, 2019 or 2020 - 3 year bank)			
<b>Tier 2 - Net Metering</b>					
Net Metering Installations (kW) as of 12/31/2017:					
Legacy (Prior to 1/1/2017) kW	1,559.00				
CY 2017 (1/1/2017 - 12/31/2017) kW	907.57				
Total Net Metering kW	2,466.57				
<b>Tier 2 Compliance Non-Renewable Provider</b>	1%				
Net Metering Energy Tier 2 Requirement without 100% renewable provider status (kWh)	688,216				
WEC NM Energy CY 2017 (kWh)	294,405				
Projected Net Metering Energy Production from all Solar Systems on line (kWh)	2,069,794				
Percent of Retail Load	3.0%				
<b>Tier 3 - Energy Transformation Program</b>					
Tier 3 Compliance Requirement	2.0%				
Tier 3 Energy Requirement	1,376,431				

**Exhibit 2.** WEC Tier III Summary.

	MWH lifetime savings claim
<b>2017 WEC Tier III savings claim summary table</b>	
WEC share of EVT/WEC savings claims	513
WEC share of CAPSTONE 2017 weatherization savings claims	580
VLITE grant to install 5 Type II charging stations	122
WEC members purchasing Nissan LEAF in 2017	192
	1,406
2017 filed Tier III annual savings target MWH	1,394
PERCENTAGE OF 2017 TARGET ACHIEVED	101%
WEC 2017 retail sales * Tier III requirement	1,376
Tier III savings as % of 2017 sales	102%

**Exhibit 3. Evidence of Payment to Capstone**

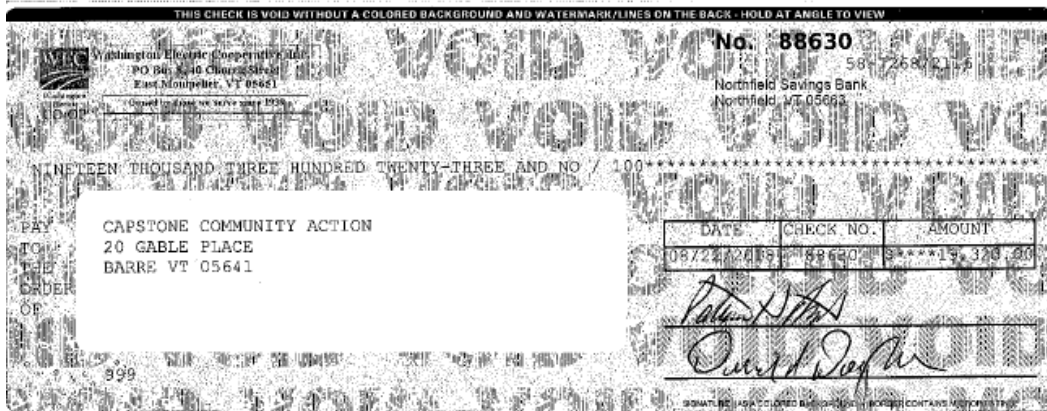


**PLEASE DETACH AND RETAIN**

**No. 88630**

Date: 08/22/2018

DATE	INVOICE	DESCRIPTION	GROSS	NET
08/20/2018	2017 TIER III	SHARE OF 2017 TIER III SAVINGS	19,323.00	19,323.00
Vendor: 999 CAPSTONE COMMUNITY ACTION			Totals:	19,323.00 19,323.00



*An energy provider owned by its members since 1939.  
Washington Electric Cooperative is an equal opportunity provider and employer.*