

**Vermont Independent Power Producers Association**  
**26 State Street**  
**Montpelier, VT 05602**

September 21, 2018

Vermont Independent Power Producers, Inc. (VIPPA) appreciates the opportunity to submit the following comments to the Vermont Public Utility Commission (PUC) regarding the Review of the Standard-Offer Program; Case No. 17-5257-INV.

VIPPA, an association of independent power producers, takes this opportunity to emphasize to the PUC that the Lawrence Berkeley National Laboratory report entitled “Comparative Review of Procurement Programs Targeting “Small Renewables” is **a vote of confidence for Vermont’s Standard Offer Program.**

This report was commissioned by the PUC’s staff to compare Vermont’s Standard Offer Program with other state programs<sup>1</sup> targeting relatively small renewable generators. The report found that Vermont’s Standard Offer Program, although small compared to the programs of other states, was similar to the other state programs in that it is mostly solar, administered by a regulatory body, results in a similar energy pricing and has a similar percentage of delays and cancellation of selected projects. The report went on to say that procurement programs, such as Vermont’s Standard Offer Program, are commonly used in other states in tandem with a Renewable Portfolio Standards and net metering programs to achieve renewable energy goals. With these positive findings, the Berkeley Lab report offered no recommendations for improvement to Vermont’s Standard Offer Program.

VIPPA recommends and encourages the PUC to work with the Vermont Legislature to enlarge the Standard Offer Program by either increasing the annual procurement requirements and/or extending the duration of the Program.

Vermont Independent Power Producers



Mathew Rubin  
President

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<sup>1</sup> The Berkeley Lab’s review compared Vermont’s Standard Offer Program with the renewable procurement programs of 10 other states.