



## Washington Electric Cooperative, Inc

P.O. Box 8, 40 Church Street  
East Montpelier, Vermont 05651

Telephone: 802-223-5245; Fax 802-223-6780  
[www.washingtonelectric.coop](http://www.washingtonelectric.coop)

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October 12, 2018

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

Case No. 17-5257-INV: Standard Offer Program Review

Dear Ms. Whitney:

Washington Electric Coop (WEC) is filing supplemental comments in the Standard Offer proceeding in response to a filing made by Vermont Electric Coop (VEC). VEC in its filing argues against continuation of the Standard Offer exemption allowed by statute. VEC states the exemption allows a utility to make use of large out-of-state wind projects to avoid purchasing in-state Vermont sources of power.

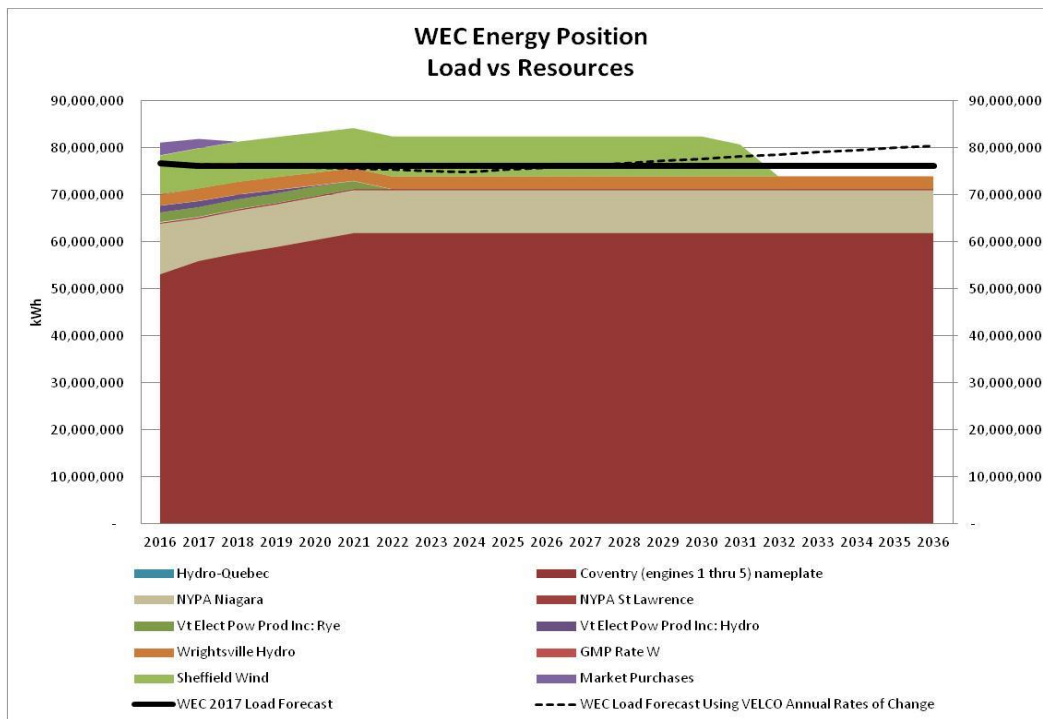
WEC filed comments on September 21, 2018. In WEC's filing I provided a summary of WEC's long term committed power supply resources. The summary shows WEC has invested in renewable sources of power and is excess energy for the foreseeable future. WEC's comments today are intended to supplement the September 21 filing and provide more information as to where WEC's power is located.

The vast majority of WEC's power comes from small power supply resources that are located in the state of Vermont. WEC's landfill to gas energy plant located in Coventry, Vermont is an 8 MW nameplate facility and it made up 64% of WEC's power supply in 2017. Another important resource in WEC's portfolio is a wind project located in Sheffield, Vermont which provided 11% of WEC's power needs in 2017. WEC's Wrightsville hydro facility located in Washington County, Vermont provided 3% of WEC's energy needs while the wood chip facility in Ryegate, Vermont provided an additional 3%. Rounding these sources out, WEC received 2% of its energy from small in-state hydro administered through VEPPi with all hydro plants located in the state of Vermont. The only long term power source that is not from Vermont that WEC is receiving power from is the long standing allotment that comes from NYPA which made up 14% of WEC's energy in 2017.

In 2017, WEC received 86% of its power from small renewable generators located in Vermont. This demonstrates that WEC has not used the standard offer exemption to make purchases in power from large out of state resources. In fact, just the opposite occurred. WEC is a leader in achieving the very goals of the standard offer program. Furthermore, WEC became 100% renewable **before** lawmakers required other utilities to invest in renewable generation located in Vermont.

As stated in our September 21 comments, WEC reiterates the exemption was created for utilities that made significant investments in renewable sources of energy long before state mandates were adopted. WEC was an early adopter of renewable technology and did so at its own direction and expense. WEC will meet its load needs for the foreseeable future with renewable power (and have excess renewable power in many period) for the next 20 years.

The standard offer program was established in 2009 by lawmakers as an effort to increase renewable generation development in the state and to help Vermont utilities that had gaps in their power supply mix to procure instate renewable sources of power. Lawmakers recognized that early adopters like WEC (that had already become 100% renewable and that had invested in Vermont based generation) should not be required to take on more power as it would increase an excess position and cause increased cost to WEC consumers. In 2009, WEC had already invested in the Coventry landfill generating plant and entered a contract to buy power from a wind farm in Sheffield, Vermont. WEC’s supply mix and long-term comparison of supply to load is provided below. As illustrated in the chart, it is clear WEC has excess power for the next 20 years. WEC’s sources of power are predominately from instate renewable resources which was the underlying goal of standard offer.



While WEC has contract rights for power from Hydro Quebec, we will not access that power until and unless we show a shortfall. WEC is not currently receiving power from HQ at this time and we do not expect to need the power for the foreseeable future. Thus, WEC expects to receive roughly 86% of its power from small scale Vermont based renewable resources.

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