

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 17-5257-INV

In re: Review of the Standard-Offer Program)

**REPLY COMMENTS OF THE DEPARTMENT OF PUBLIC SERVICE IN
RESPONSE TO THE PUBLIC UTILITY COMMISSION'S
PROPOSED REVISIONS TO 30 V.S.A. § 8005a(k)(2)(B).**

The Department of Public Service (“Department”) appreciates the opportunity to provide reply comments on the Public Utility Commission’s (“Commission”) filing of November 28, 2018, which contained potential revisions to 30 V.S.A. § 8005a(k)(2)(B) and the exemption provided therein.

Generally, the Commission’s potential revisions are consistent with the Department’s position as laid out in its September 21, 2018 comments. The proposed changes would grandfather the exemption for presently qualifying utilities only, while also bringing its requirements closer to the Renewable Energy Standard. However, the Department respectfully recommends the minor clarification that Vermont Tier 1 attributes, specifically, should be retired.

The Commission’s draft of 30 V.S.A. § 8005a(k)(2)(B)(ii) currently reads: “the retail electricity provider owns and retires an amount of renewable energy attributes that is not less than the provider’s retail sales.”

The Department’s proposed addition to the Commission’s draft would say: “the retail electricity provider owns and retires an amount of 30 V.S.A. § 8005(a)(1) qualified renewable

energy attributes that is not less than the provider's retail sales." The Department's proposed language would add further detail and clarity to the Commission's proposed revisions.

With the addition of its proposed language, the Department supports the Commission's potential revisions to 30 V.S.A. § 8005a(k)(2)(B). The Department appreciates the opportunity to comment in this matter and looks forward to participating further, as appropriate, to discuss or refine its proposal for a successor mechanism to align the standard-offer program to current technology and regulatory circumstances.

Dated at Montpelier, Vermont this 4th day of December, 2018

VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Alexander Wing
Alexander Wing, Special Counsel
112 State Street
Montpelier, VT 05620-2601
(802) 828-4011
alexander.wing@vermont.gov