



BURLINGTON
ELECTRIC
DEPARTMENT



December 4, 2018

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

Re: Case 17-5257-INV – Review of the standard-offer program

Dear Ms. Whitney:

In a memo dated November 28, 2018, the Public Utility Commission (“PUC”) staff requested comments on three potential changes to the text of 30 V.S.A. § 8005a(k)(2)(B). Vermont Public Power Supply Authority (“VPPSA”) and Burlington Electric Department (“BED”) support the first two statutory changes contained in the PUC proposal.

The third proposed change would change the reporting period used to qualify for the standard offer exemption from November 1 through October 31 to the calendar year. While VPPSA and BED support the concept of aligning the reporting period for the standard offer exemption with the utilities’ Renewable Energy Standard reporting obligations, this proposed change would be impossible from an implementation perspective. Having the reporting period end the day before the exemption was supposed to take effect would not allow the utility time to determine final retail sales and generation numbers or petition the PUC for a determination of exemption. Even if this problem were resolved, despite the conceptual merit, a change in the qualification period has the potential to cause unintended consequences by creating at least one unusually short (or long) exemption period depending on how the implementation was timed. VPPSA and BED suggest that maintaining the current timing to avoid this complication, and other potential unintended consequences, is actually the most straightforward proposal – and the additional reporting requirement does not require significant effort.

In addition, The PUC memo indicated a desire to understand how the requirement to retire renewable energy attributes that is not less than the utility’s annual retail sales would affect Swanton. Like BED and Washington Electric Coop, Swanton manages its power supply portfolio to maintain 100% renewability. Thus, Swanton does not oppose this additional requirement for qualifying for a standard offer exemption.

Thank you for your consideration of these comments. Please contact me (mbailey@vppsa.com or 802-882-8509) with any questions you may have.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Bailey". The signature is written in black ink and is positioned below the word "Sincerely,".

Melissa Bailey
Legislative and Regulatory Affairs Representative
Vermont Public Power Supply Authority