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December 4, 2018

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

filed via ePUC

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

Dear Ms. Whitney:

This letter responds to the November 28, 2018 Memorandum from Hearing Officer Jake Marren requesting feedback on three potential revisions Public Utility Commission (“PUC”) staff are considering to the text of 30 V.S.A. § 8005a(k)(2)(B). By this filing, Green Mountain Power provides its feedback.

The first change being considered is to restrict eligibility for the standard offer exemption to utilities that previously qualified for it. As set forth in the October 19, 2018 comments from the distribution utilities (“DUs”), the DUs requested that the PUC recommend that the Legislature phase out the standard-offer program by eliminating standard-offer solicitations after the 2019 Request for Proposals. The DUs also requested that utilities that have been exempted by PUC Order from participation in the standard-offer program should be able to remain exempt for the duration of any standard-offer contracts, provided these DUs maintain 100% renewability in their power supply portfolios. So, if an exempt utility fails to qualify for the exemption in any year, that utility should not be able to apply for the exemption again. The PUC could of course consider a force majeure exception in the event that a catastrophic weather event removes a generation facility from an exempt entity’s portfolio. If the PUC were in favor of allowing an exempt utility to renew its exempt status after failing to qualify for one or more years, GMP recommends that the renewed exemption only apply to future, and not past, standard offer obligations.

The second change being considered is that a utility must own and retire an amount of renewable energy attributes that is not less than the utility’s annual retail sales in order to qualify for the exemption. GMP believes that the retirement of RECs is a reasonable way for a utility to show ownership of renewable generation that it is using to qualify for an exemption. This requirement would be consistent with how ownership of renewable generation is shown under Vermont’s Renewable Energy Standard (“RES”) and would not pose an undue burden on the utility claiming the exemption.

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The last change proposed is to the reporting period used to qualify for the exemption from October 31 to the calendar year ending December 31 in order to coincide with the utilities' reporting obligations under the RES. GMP believes that this proposed change makes sense.

Thank you for this opportunity to comment, and if you have any questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carolyn B. Anderson".

Carolyn Browne Anderson

CBA

cc: ePUC Service List