

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 17-4632-INV

Final Order Approving 2017 Renewable Energy Standard Compliance Filings	December 21, 2018
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**MOTION TO ALTER OR AMEND**

Vermont Electric Cooperative (VEC) hereby moves the Public Utility Commission (Commission) to alter or amend its December 10, 2018 Final Order Approving 2017 Renewable Energy Standard Compliance Filings (Order).

On page 4 of the Order, the Commission acknowledged a supplemental compliance filing that VEC had made on October 10, 2018 to update its 2017 Tier III compliance figures. However, the Tier III figures on page 6 of the Order did not take this supplemental compliance filing into account. VEC requests that the Commission modify the Order to adjust VEC's 2017 Tier III savings from 8,883 MWh to a total of 11,467 MWh, which would result in VEC banking 2,584 MWh to use for future Tier III compliance.

For background, VEC made this supplemental compliance filing after discovering an inconsistency in the methodologies between our calculation of Tier III credits and that of Green Mountain Power (GMP). The purpose of VEC's October 10, 2018 filing was to bring our methodology into alignment with GMP's.

The difference between the two filings is how VEC calculated the electric penalty required for distribution utilities that do not currently have 100 percent renewable power supply portfolios. This penalty applies only when the measure increases electric consumption (eg an electric vehicle, which displaces gas but increases kilowatt-hour usage). VEC submitted its initial Tier III claims based on the percent of its power supply that is renewable under Tier I. GMP calculated its Tier III claims based on the percent non-fossil fuel, which would include nuclear as well as Tier I resources.

After learning of this discrepancy in late September, VEC spoke with GMP as well as with the Department of Public Service, and all parties agreed that GMP's approach is best. According to §8005(a)(3)(A), the purpose of Tier III is to "reduce fossil fuel consumed by [electric utilities'] customers and the emission of greenhouses gases attributable to that consumption." The nuclear portion of a utility's power supply portfolio does as much to help meet this goal as renewable resources do. The only change to the supplemental compliance filing was from percent renewable to percent non-fossil fuel. The latter includes Tier I resources as well as VEC's entitlement to nuclear resources under contract through 2034.

Respectfully submitted,



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