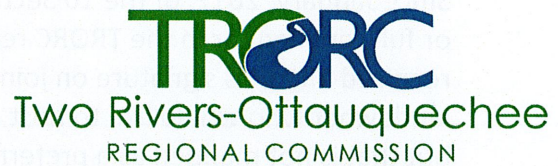


May 9, 2019

Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05702
(Filed electronically via ePUC)



RE: State of Vermont Public Utility Commission Case #19-0855-RULE

Dear Commissioners:

The Two Rivers-Ottawaquechee Regional Commission (TRORC) is providing these written comments in response to the PUC Order initiating a proceeding to review Commission Rule 5.100, governing the construction and operation of net-metering systems and the PUC draft changes to Rule 5.100.

The PUC's order proposes changes to amending pending net-metering registrations and applications as well as approved net-metering systems. TRORC supports the elimination of the distinction between a major and minor amendment to registrations, applications and approved systems.

The PUC's order seeks comments on whether there should be a simplified process for obtaining a CPG for a solar canopy over an existing parking lot, such as the current process for rooftop systems. TRORC supports a simplified process for parking lot canopies.

The PUC's draft rule (pages 9-10, Preferred Site Definitions 4, 5, 6) clarifies the site descriptions for brownfields, landfills and mineral resource extraction. TRORC supports these clarifications.

The draft rule (page 10-11, Preferred Site Definition 7) eliminates the option for a preferred site to be identified through a "joint letter of support from the municipal legislative body and municipal and regional planning commissions in the community where the net-metering system will be located."

TRORC opposes this proposed change and would like the PUC to maintain the provision that allows towns to identify preferred sites through the joint letter of support. Towns in the TRORC region spend many hours carefully considering and delineating maps to identify preferred and constrained areas for renewable energy systems. Some preferred areas are easy to identify, such as town highways where three-phase power lines are prevalent. But it is impossible to identify every parcel that may be ideal for renewable energy development. Many of our towns have found that, when approached by a landowner or developer, writing a joint letter of support identifying a specific location as preferred is an extremely valuable tool for renewable energy development.

Since January, 2017, of the 16 Section 248 applications that have been proposed or fully applied for in the TRORC region, 10 applicants have requested and have received TRORC's signature on joint letters of support. Without this provision, a landowner who would like to host a renewable energy system on their property, but that is not mapped as a preferred site in the Town Plan, may need to wait up to 8 years through the Town Plan adoption process to have their property identified as preferred and receive the preferential sitting adjustor that may make the project financially viable. The ability to carefully review a proposed parcel for preferred status and then issuing a joint letter of support from both the municipal and regional perspective, has been instrumental in recent years in moving renewable energy projects forward in the TRORC region. TRORC encourages changes to the language of this provision to something similar to "a written determination from the legislative body and municipal and regional planning commissions that the site in question is a preferred site for net-metering system development based on the policies in their respective plans. The municipality and RPC reserve the right to further review and comment as the project moves through the petition process and more details become available."

Thank you for the opportunity to comment. We look forward to reviewing further drafts of Rule 51.00 and may submit further comments and the rulemaking process continues.

Sincerely,



Dee Gish
Finance Manager and Special Projects

cc: Peter Gregory, Executive Director