

Ms. Judith Whitney, Clerk
Public Utility Commission
112 State Street
Montpelier, VT 05702

May 17, 2019

RE: Case No. 19-0855-RULE_Proposed revisions to Vermont Public Utility Commission Rule 5.100

Dear Commissioners,

The Springfield Energy Committee is providing these written comments regarding the proposed revisions to Rule 5.100. We are specifically concerned about Section 5.103's definition of "preferred sites." Currently municipalities and the regional planning commissions can influence where renewable energy projects are sited under the Net Metering Rules. The proposed rules eliminate the ability of municipalities and regional planning commissions to designate a "preferred site" through a joint letter. That means municipalities and regional planning commissions must rely solely on preferred sites that are specifically identified in municipal plans.

The Springfield Energy Committee worked with the Southern Windsor County Regional Planning Commission (SWCRPC) to write an enhanced energy plan. Our implementation pathways are consistent with what is contained in *Guidance for Municipal Enhanced Energy Planning Standards* (DPS; March 2, 2017). In "Pathways Standard 9: Statement of Policy on the Development and Siting of Renewable Energy Resources" we listed where projects shall not be sited; where projects could be sited, but with constraints requiring mitigation; and sites that are ideal, preferred sites. We then developed policy, or guidelines, for the remaining land to be considered for renewable energy sites. There is no way to identify specifically all the sites that are preferred sites. It defies logic. Additionally, as an energy committee we want to promote the development of renewable energy to meet our goals. Naming specific sites would surely shortchange the potential for site development. The process in place now, the use of a joint letter to designate a site as a "preferred site" works well. First, it avoids the pitfall of under identification of "preferred sites" and conversely allows for all potential sites to be considered. Secondly, it allows all the stakeholders to meet and work collaboratively at an early stage of site development.

For these reasons, the Springfield Energy Committee respectfully requests that the PUC keep the ability for municipalities and regional planning commissions to write a joint letter to identify "preferred sites."

Sincerely,



Char Osterlund
Chair, Springfield Energy Committee