



## Institute for Energy and the Environment

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May 17, 2019

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

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

Dear Commissioners:

The Institute for Energy and the Environment at Vermont Law School (IEE) is providing these written comments regarding the proposed revisions to Vermont Public Utility Commission Rule 5.100. The IEE is specifically commenting on Section 5.103's definition of "preferred sites."

First, the IEE wants to support the comments provided by the Town of Hartford on this issue particularly the comment that "the proposed Rules' elimination of the option to classify preferred sites through a joint letter between the municipality and regional planning commission presents a significant challenge to Hartford's ability to promote needed renewable energy advancement." Furthermore, from our experience this is not only limiting a municipality's ability to promote needed renewable energy advancement, but it limits multiple community-based organizations' ability to promote sustainably developed local solar. As another example, we have worked with multiple local farms whose vast acreage is not likely to be designated as a preferred site but where modest community solar developments could be sited with local support on the house-site portion of the land in a manner that offers properly-sited clean energy benefits to the community members participating in the project and additional income to the local farmers. We see no good reason to change or limit this process that is generally favored by the communities we work with.

Thank you very much for your consideration. Please feel free to contact us if you have any questions regarding these comments.

Sincerely

Kevin B. Jones, PhD  
Professor and Director