



November 1, 2019

Filed via ePUC

Mrs. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602

***Re: Proposed revisions to Net Metering Rule 5.100 (Docket No. 19-0855-RULE)
Response to August 22, 2019 Procedural Order***

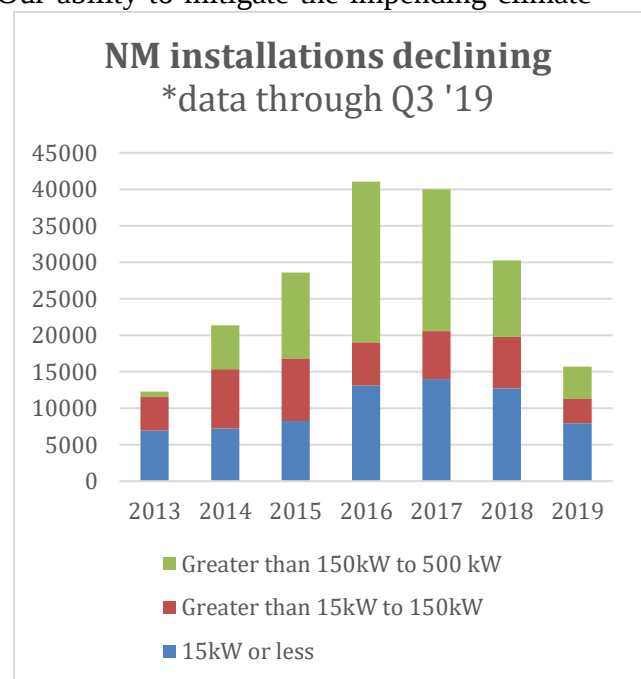
Dear Commissioners:

Renewable Energy Vermont (“REV”) submits the following comments in response to the Commission’s request for additional comments dated August 22, 2019. These comments should be read in concert with REV’s prior comments submitted on May 17, 2019. REV and its members look forward to working with the Commission during the workshop phase to continue building on the success of Vermont’s net metering program.

I. PRELIMINARY STATEMENT

Reporting by the Intergovernmental Panel on Climate Change¹ makes clear that the next decade is crucial for the trajectory of our world’s climate. Our ability to mitigate the impending climate crisis will be significantly impacted by our actions in the immediate future and we in the renewable energy industry argue that policy should, when confronted with uncertainty, err on the side of increased deployment of renewable energy resources. We will never be able to reclaim the mitigating effects of offsets implemented now.

2019 is shaping up to see the smallest amount of net metered capacity added since 2014.² The reduction has mirrored policy and compensation changes over the past five years. These reductions have a direct impact on Vermonter’s ability to participate directly in our clean energy transition, the local jobs that support them, and the local investment.



¹ <https://www.ipcc.ch/reports/>

² Data compiled from Vermont utility reports to ISO-NE of installed renewable generation as of October 1, 2019.



The next two years also offer a crucial opportunity to implement substantial local resources leveraged with federal dollars. As the Federal ITC begins to sunset and ultimately expire, the cost to adopt solar will increase for Vermonters. From a financial and environmental perspective, now is the time to act. Local net-metered renewable energy also creates resilience and greater energy reliability and security from climate change impacts that Vermonters are already experiencing.

As a state, our ability to have an impact on the climate is at least two-fold. First, we must take responsibility for our own emissions and seek to mitigate their effects to the extent possible by implementing local solutions. Second, because our regulators, legislators, utilities, renewable energy providers and citizens are committed to addressing climate change and because our small size enables productive discussions (such as this rule-making process), we have the opportunity to implement solutions that frequently guide others in their adoption of renewable energy strategies.

The renewable energy trades in Vermont currently offer the technology and the existing regulatory structure and net metering program is enabling our state to directly and tangibly address climate change. This cannot be overstated. Our challenge now is to continue implementing programs that most efficiently support rapid local renewable energy adoption. Vermont's net metering program provides an important avenue to meet the environmental goals of the state, and has proven to be one of the most effective mechanism driving engagement of Vermonters directly in this transition. Net metering customers and local solar companies are also a significant force behind the adoption of heat pumps and electric vehicle awareness and adoption.

Vermont's net metering program further empowers the state's economy. Vermont spends at least \$2.58 billion each year on energy (electricity, heating and transportation) and approximately \$800 million annually on electricity.³ Rather than continue to export most of that money out of our local economy, every net metering project puts local investment to work, puts local people to work, and keeps more of Vermonters' money circulating in state, building a vibrant and sustained clean energy future.⁴

II. NET METERING COMPENSATION STRUCTURE

It is undisputed that overall, Vermont's net metering program catalyzed and created significant deployment of distributed renewable energy. However, in recent years the regulatory framework has become more restrictive and more expensive while participating customer compensation has dropped. When balancing the benefits and costs of net metering, the Commission must take into

³ U.S. EIA, State Energy Data System, Table F30, Total Energy Consumption, Price, and Expenditure Estimates, 2017. <https://www.eia.gov/state/analysis.php?sid=VT#14>

⁴ That renewable energy projects result in economic benefits cannot really be disputed and has been clearly acknowledged by the Commission. See, e.g., *Petition of Coolidge Solar I, LLC*, Docket No. 8685, Order of March 23, 2017 ¶¶ 57-60.



account all of the benefits that accrue. A simplistic utility analysis is not appropriate, and REV appreciates the Commission's broad request for information relating to benefits.⁵

A. Benefits

The benefits of net metering generally are well recognized. Numerous benefits and comprehensive methods to value them and assess true costs are widely accepted, as illustrated in the attached analysis reviewed by ICF.⁶ REV requests that the Commission continue to incorporate all direct and indirect benefits arising from the net metering program during this rulemaking and as the Commission considers future rates.⁷

Participants in the net metering program finance utility distribution grid upgrades and modernization, pay interconnection costs, and drive energy system innovation. By encouraging private capital investment in renewable energy, the net metering program enables all development, construction, interconnection and O&M costs to be kept outside the utility rate base, which is where the costs would fall were utilities to deploy these assets themselves.

Deployment of distributed generation through net metering generally enables utilities to limit their and ratepayer costs associated with forward capacity markets, increasing grid resilience, and reducing reliance on foreign energy producers providing power from distant resources. ISO-New England highlighted one of the many benefits of behind-the-meter solar when it noted that New England's July 2019 summer peak would have been 1,000 MW higher without these resources.⁸

Increasing equitable access to renewable energy is also a significant benefit of the net metering program. Deployment of new technology is often first adopted by those with a particularized interest or financial means to do so. However, as the net metering program has developed, individual and community participation in Vermont (and elsewhere) has spread more generally across the geographic and economic spectrum, particularly as the competitive marketplace has diversified its offerings. In this context, changes to the net metering program raise important

⁵ We would point out that the Commission is one of many entities engaged in this analysis across the country. Review of Recent Cost-Benefit Studies Related to Net Metering and Distributed Solar, Prepared by ICF for the US Department of Energy, May 2018. https://www.icf.com/-/media/files/icf/reports/2019/icf-nem-meta-analysis_formatted-final_revised-1-17-193.pdf

⁶ Id. at 11.

⁷ The direct benefits of a single 500 kW project were described in detail by the Applicant in testimony and exhibits submitted in *Derby GLC Solar, LLC*, Case No. 17-1247-NMP. The benefits of this single project were estimated to be approximately \$1.1 million.

⁸ <http://isonewswire.com/updates/2019/10/2/summer-2019-lowest-regional-grid-electricity-use-in-at-least.html>. Along these same lines, the Commission should recognize that a reduction in electricity usage does not create a cost. When a customer installs more efficient light bulbs, appliances, or insulation, there is no claim from the utility that there is a cost-shift, despite the fact that the system costs are then spread over a smaller number of kilowatt-hours. Hunting camps, vacation-homes, seasonal rentals all only use electricity on an intermittent basis. Yet, again, utilities do not claim that those customers are not paying their fair share, as long as the customer charge is paid. Self-generation via net metering is no different.



equity issues. In particular, the Commission should consider whether further limiting the net metering program will now disproportionately affect participation by less-affluent individuals and communities.

Vermont law requires net metering be available to all customers who want to participate.⁹ Vermont's renewable energy installers are strongly committed to providing access to lower income communities, and welcome regulatory approaches that promote addressing this need. As has been adopted in other states, one avenue to supporting desired adoption is to provide intentional incentives for net metering designed for low and moderate income participants.

Local tax benefits and land leases benefits accrue directly from net metering. In the case of Vermont, which is largely rural, these benefits can be significant. A \$10,000 annual lease payment may not seem like a large societal benefit, but to a struggling small family farm, that income can make all the difference, and the secondary benefits are clearly obvious though perhaps difficult to quantify in dollars and cents.

The Legislature created net metering to enable local renewable energy deployment with customer participation and private investment. It was not designed to provide the lowest rates of power in a market where the base prices largely depend on fossil fuels. As indicated by 30 VSA § 8001 and 8010, the goals of the state's renewable energy policy are broadly conceived.¹⁰ These binding

⁹ The rules are supposed to maintain a program that "ensures that all customers who want to participate in net metering have the opportunity to do so;" 30 V.S.A. § 8010 (c)(1)(E)

¹⁰ 30 V.S.A. § 8001(a) states:

- (1) Balancing the benefits, lifetime costs, and rates of the State's overall energy portfolio to ensure that to the greatest extent possible the economic benefits of renewable energy in the State flow to the Vermont economy in general, and to the rate-paying citizens of the State in particular.
- (2) Supporting development of renewable energy that uses natural resources efficiently and related planned energy industries in Vermont, and the jobs and economic benefits associated with such development, while retaining and supporting existing renewable energy infrastructure.
- (3) Providing an incentive for the State's retail electricity providers to enter into affordable, long-term, stably priced renewable energy contracts that mitigate market price fluctuation for Vermonters.
- (4) Developing viable markets for renewable energy and energy efficiency projects.
- (5) Protecting and promoting air and water quality in the State and region through the displacement of those fuels, including fossil fuels, which are known to emit or discharge pollutants.
- (6) Contributing to reductions in global climate change and anticipating the impacts on the State's economy that might be caused by federal regulation designed to attain those reductions.
- (7) Providing support and incentives to locate renewable energy plants of small and moderate size in a manner that is distributed across the State's electric grid, including locating such plants in areas that will provide benefit to the operation and management of that grid through such means as reducing line losses and addressing transmission and distribution constraints.



statutes in combination with the Comprehensive Energy Plan make clear that the full societal costs and benefits must be evaluated and that potential cost shifting is only one of a number of metrics to be considered.¹¹

When a complete programmatic cost-benefit analysis is undertaken, net metering provides not only an excellent avenue for Vermont (as a state) to meet its renewable energy goals with local resources, but is also a vital component of a sustainable climate economy as envisioned in the formation of the program.¹² And as noted above, all of the societal costs and benefits associated with net metering must be included as part of an analysis of the program.

In addition to energy, capacity and transmission and distribution avoided costs, a full accounting of the range of net metering benefits should include at least grid investment upgrades, local taxes, state taxes, land use lease payments, public good investments such as remediation, and environmental benefits (such as GHG, SO_x and NO_x reductions) and the value of engaging Vermonters in strategic electrification (e.g. battery storage, electric vehicles, and electric heat pumps). The following is a conservative, non-exhaustive estimate of the direct economic investments/benefits (in addition to avoided costs) provided by a typical 500 kW (AC) school or town system (residential and onsite commercial installations can contribute additional benefits).

- \$75,000 in utility grid upgrades (assumes ½ of interconnection are project-specific costs)
- \$7,000 annually in state and local taxes
- \$25,000 annually in customer savings from self-generation
- \$7,500 annually in land use lease payments
- \$50,000 in public good benefits such as remediation or invasive species reduction
- \$600,000 invested directly in the local economy in terms of wages and services including permitting, legal & accounting, electrical, mechanical, and site work.

The numbers above show that when we buy our power locally as well, significant benefits flow to the Vermont economy, none of which are provided by out of state resources. On a per megawatt basis, school and town 500 kW (AC) systems provide more than \$1,200,000 of direct investment in the Vermont economy and approximately \$1,000,000 in societal benefits over 25 years. These figures do not include larger societal and environmental benefits. Further, an important benefit of net metering is customer electric price certainty and electric bill reductions that are associated with self-generation. The net metering program recognizes that the transition to a modern grid includes

(8) Promoting the inclusion, in Vermont's electric supply portfolio, of renewable energy plants that are diverse in plant capacity and type of renewable energy technology.

¹¹ 30 V.S.A. § 8010 (c)(1)(D) requires a program that “accounts for all costs and benefits of net metering, including the potential for net metering to contribute toward relieving supply constraints in the transmission and distribution systems and to reduce consumption of fossil fuels for heating and transportation.”

¹² “Electric generation in Vermont can be a boon to the state’s economy” and “Building and operating electricity generation facilities requires significant investment that generates substantial direct, indirect, and induced economic benefit.” (Comprehensive Energy Plan at 242)



customers owning and supporting their own energy generating assets. These customers take on the expense and effort of installing these systems and the benefit to these customers as self-generating rate payers must be included in the analysis of the value provided by net metering.

The resiliency of local generation is another public good that needs to be valued. This is especially true in an environmental context where extreme weather events are occurring with greater regularity.

Deployment of local renewable energy projects as encouraged by the net metering program also results in indirect economic activity. As the Department of Public Service noted, “[w]ith the highest clean energy employment per capita in the nation (5.7%), the Clean Energy Industry is a significant contributor to the Vermont economy.” Generating almost 2,000 jobs, Vermont’s renewable energy sector is an important component in the clean energy industry and Vermont’s overall economy.¹³ And many of these jobs require valuable skills. However, with reductions in net metering support and national pressures such as tariffs and a decline in the Investment Tax Credit, the solar sector has been shrinking with an almost 8% drop in during 2018. One estimate of the value of the induced economic activity of one megawatt of distributed solar is 3.5 times the wages and services paid out as a result of the development. Based on the \$1,200,000 per megawatt noted above, the induced economic activity per megawatt would be \$4,200,000, further broadening the already well distributed economic benefits of net metering.

A robust net metering program is also integral to the State achieving its goals as set out in the Comprehensive Energy Plan. In addition to cost and benefit considerations, a fundamental objective of the program is to achieve “a level of deployment that is consistent with the recommendations of the Electrical Energy and Comprehensive Energy Plans under sections 202 and 202b of this title.” The Comprehensive Energy Plan lays out three scenarios for meeting Vermont’s clean energy goals. These include between 1,500 and 2,250 MW of new solar deployments. The average of these is 1,875 MW.

Finally, assuming the State wants to encourage electricity storage adoption and create a more resilient and reliable energy system, the best method is via robust net metering program. The latest WoodMac storage monitor report¹⁴ shows that roughly 95% of the residential storage was deployed with solar. Robust net metering policy drives solar adoption, which is connected to resilient storage adoption.

B. Compensation Changes

As set out in REV’s previous comments, the net metering program has allowed for cost-effective renewable generation deployment into virtually every municipality in the State. Given a proper

¹³ VT Department of Public Service, 2019 Vermont Clean Energy Industry Report.

https://publicservice.vermont.gov/sites/dps/files/documents/Renewable_Energy/CEDF/Reports/VCEIR%202019%20Final%20Signed.pdf

¹⁴ <https://www.woodmac.com/research/products/power-and-renewables/us-energy-storage-monitor/>



balancing of all of the legislatively mandated factors, REV urges the Commission to maintain a retail based net metering compensation structure.

The costs of Vermont's net metering program need to be evaluated in a forward-looking manner that considers the latest compensation provided to systems of different sizes as part of the PUC approved rates. Specifically, when cost is evaluated, the latest rates that are in effect for CPG applications filed after July 1, 2019 should be used (not earlier rates). As part of the biennial review in 2017, the PUC reduced the net metering rates for 2018 and 2019. The 2019 net metering rule and rates for new projects reflect little cost shift or negative economic on utilities and overall electric bills, particularly when taken in full context of other electric utility rate drivers and costs. It is also important that program costs be reported not only in terms of rates but also in absolute dollar amounts. The absolute dollar amount is important because its needs to be evaluated relative to other utility costs. For example, Green Mountain Power has an annual budget of over \$600,000,000 and the cost of net metering needs to be considered in the context of all of these expenses.

As REV stated in prior comments, predictability is important and the reduction in net metering applications can be attributed in part to a shrinking pool of investors who are willing to deploy capital in the Vermont market given the risks posed by a greater level of regulatory uncertainty. A vibrant and sustainable clean energy economy requires a consistent, coherent structure that also allows businesses and customers to plan ahead. A constantly shifting regulatory environment is highly inefficient and leads to unhealthy cycles. As the Comprehensive Energy Plan notes, “[b]ecause net metering provides an appropriate tool to develop a significant portion of this generation, it is critical that the state implement a program that is financially sustainable over the long term and avoids boom-and-bust cycles. This requires allowing participation from a wide range of possible customers, in each utility service territory, while being financially sustainable for both participating and non-participating customers, as well as for the firms that develop and install generators.”¹⁵

Accurate Renewable Energy Credit (“REC”) pricing is vital. As of October 31, 2019 market prices for RECs for 2020 range from 4.4 to 4.6 cents. New net metering customers are essentially required to give this value to Vermont utilities without fair compensation as the current REC adjustor is 1 cent. A clear accounting of REC valuation is important an important part of any fair and balanced analysis of the impact of the net metering program. For example, if any utility sells RECs for a higher price per kWh than the rate paid through net metering, then these profits should be included as part of the financial benefits accruing to ratepayers due to net metering. (We note that the 2018 Green Mountain Power budget includes \$21,000,000 in REC sales.) We request that the Commission review and reconsider the REC adjustor value and customer bill credits or penalties.

It is also notable that though the net metering program does provide an adder for retiring RECs and siting on rooftops, these adders incentivize undersizing of solar systems. Customers can

¹⁵ Comprehensive Energy Plan at 257.



produce credits equal to yearly load with a solar system that does not actually produce the number of kWhs needed to offset annual load. If a customer did size to fully offset with kWhs, then they would lose the value of the additional credits.

Solar net metering systems are warranted for 25 to 30 years and will provide benefits and quantifiable economic value to self-generating customers, utilities, and society for their entire operating lifetime.

C. Time of Use Rates

The Commission has asked for comments on time of use (“TOU”) rates. REV’s position is that TOU rates are certainly no substitute for the present net metering program. It is true that TOU rates may at some point prove to be a potential path to better align actual system costs with a utility’s cost recovery.¹⁶ However, TOU rates are orders of magnitude more complicated for customers than flat volumetric rates. Complications arise on both on the analytical side in creating the TOU parameters, and on the customer-facing side. Unlike commercial and industrial customers who likely have someone on staff who is responsible for energy cost management, we believe the average Vermont family would find TOU rates both difficult to understand and manage.

Nationally, when only self-generating or distributed generation reliant customers are pushed into a different rate design post-DER adoption, this halts DER adoption. Having a kitchen-table conversation with a busy family about how solar and storage can help them manage a TOU rate that they are mandated to be on, as in California, is very different from having that same conversation but having to both explain a brand new rate and new technology to manage that rate. Additionally, without historical load data, it would be impossible to present any value proposition to the customer. Absent mandatory TOU for all residential customers, therefore, it is REV’s position that TOU net metering would not be a good fit in Vermont. Optional TOU could be an area that warrants a pilot, but would likely only prove valuable with significant changes, such as allowing cash out.

In fact, with the current net metering program-plus-BYOD for storage, Vermont is poised to capture much of the value that TOU would bring without creating the consumer protection issue of TOU for residential customers. With net metering-plus-BYOD, customers and their aggregators can align production and usage to meet grid needs. Rather than disrupting the foundational DER market mechanism of net metering, it would be worthwhile to explore how to expand Bring Your Own Device programs to all Vermonters and creating a permanent load shift product (i.e., not just chasing particular peaks) or identifying locational value or resiliency value.

¹⁶ California has pioneered this approach by defaulting all residential customers into time-of-use rates, with a massive educational program to ensure that consumers are ready. In California, where TOU rates are mandatory, solar and storage are being used to help customers manage their bills. The stored solar is time shifted to align with peak windows.



D. Additional Comments Regarding Compensation Structure

The next two years represent a crucial opportunity for Vermont to leverage significant federal dollars into the state as part of meeting our clean energy goals. As opposed to slowing in-state deployment, the PUC should be accelerating solar adoption during this time window. The Federal Investment Tax Credit drops to 26% in 2020, to 22% in 2021, and to 0% in 2022 for residential systems and to 10% for non-residential systems. The loss of the ITC will increase the cost of solar to Vermonters. From a cost efficiency perspective, as much capacity should be built during the period in which federal incentives are still available.

Every state in the northeast has retail rate net metering for residential systems today (which net out over a full year). In New York retail net metering is still accepted as the best solution for onsite commercial and residential customers. Additionally, no state in New England has a cap on its net metering program. In fact, Vermont has one of the least favorable solar policies in New England. Every other state in New England, besides Maine and Vermont, offer an incentive program plus full retail net metering with some minor nuances (in New Hampshire, for example, monthly net excess generation is credited at a slight discount, whereas in Vermont the efficiency charge will be assessed on gross consumption. In Massachusetts, residential customers can net out non-bypassable charges with net metering credits). In NY there is a 25% state tax credit and a per kW rebate which increases for low- and moderate-income customers. Vermont is the only state where residential customers receive less than retail compensation when they keep their RECs and some net metered customers receive less than retail when RECs are transferred to the local utility. Vermont and Maine are the only states without some sort of direct solar incentive (Massachusetts has SMART; New Hampshire has its Renewable Energy Fund; Connecticut has its Green Bank; and Rhode Island has its Renewable Energy Fund).

For an efficient, cost-effective and resilient energy system it must be one that is home, business, and community based. As such, the Commission should maintain no annual limit on the amount of new net metering, which as noted above is consistent with other states practices.

The Commission should not allow utilities to offer alternative net metering programs. Not only does this create confusion for customers and difficulty in communication and marketing for local businesses and utilities, but is not clearly consistent with the Legislature's intent for net metering program implementation.

III. PREFERRED SITES

A. Joint Letter Preferred Site Designation

The current more localized approach to determining preferred sites has increased positive community engagement on energy siting and planning for solar projects and been well received and supported by Regional Planning Commissions, local planning commissions, and local governments and energy committees, as evidenced by their comments in this proceeding. The current process requires communities to look holistically at their energy generating obligations and to develop a plan that reconciles these needs with other local land use planning considerations.



It creates a partnership between communities, land owners, and renewable energy businesses where they work together to exchange information in an open and public process to find sites suitable for renewable energy generation. As part of this process, each community has its own unique set of circumstances that must be weighed as part of the decision-making process. The Commission further guides a rigorous review of applications for solar installations that includes extensive input from state agencies regarding a myriad of technical and environmental factors. The Commission's review should not also include usurping local determinations as to whether a proposed system is in accordance with local and regional land use planning. Ultimately, this is simply a question of local control where it is appropriate. It is REV's position that such preferred siting determinations should not be constrained or reviewable by the PUC.

It is deeply concerning that the Agency of Natural Resources in its comments submitted on October 17 made a false and inflammatory suggestion that developers, municipalities and regional planning authorities are conspiring to use the "joint letter" preferred site designation to "circumvent" other preferred site designations.¹⁷ The Agency cites no proof to support this allegation and REV does not believe the joint letter preferred site designation is being misused in any manner. Various municipalities and planning agencies submitted comments which overwhelmingly support the joint-letter designation as a useful local planning tool.

Furthermore, regarding any potential "circumvention" via the "joint letter" route to preferred site designation, it is important to remember that the Natural Resources Board and Agency of Natural Resources are both statutory parties to Commission proceedings. Receiving designation as a preferred site by local governments in no way alleviates a potential project's environmental permitting requirements outside of the CPG process or creates a scenario where a project would escape scrutiny of potential environmental impacts.

B. Sanitary Landfill Preferred Site

As a pre-requisite for preferred site eligibility under the landfill rule, REV members report that the Agency of Natural Resources has been requiring both of the following: (1) the landfill must be a "sanitary" landfill only (which is stated in the Rule), and (2) the entire project must be located on the landfill cap and nowhere else on the landfill site. The second criterion in particular has frustrated municipalities and developers alike. Waste disposal sites of all types involve significantly more impacted property than just the capped area. Uncapped areas of an overall landfill site may be the most appropriate for construction of an array. Also, the cap is the most difficult and sensitive portion of a landfill site to build on so it is counterintuitive for the Agency to limit construction to only those portions. This restriction should be eliminated.

Denying preferred site designation to solid waste disposal sites that are not strictly "sanitary" landfills (a narrow subset of the more general term "landfill"), such as "categorical waste" disposal

¹⁷ Letter of B. Coster, October 17, 2019 at 5: "Applicants may be doing this to circumvent the requirements of definitions 4, 5, and 6. In the case of brownfields and landfills, such circumvention reduces opportunities for pre-application consultation with Agency programs that can provide assistance to applicants and host landowners. In the case of mineral extraction sites, joint letters of support may be sought to avoid reclamation requirements."



sites, eliminates sites that are good candidates for project development. These sorts of historically impacted sites are precisely where the Commission has directed development and their use should be encouraged.¹⁸ Thus, REV would appreciate a clarification to the landfill preferred site criteria whereby the Commission states plainly that development is permitted anywhere on a current or former “solid waste disposal” facility. This would eliminate the unnecessary restriction that the project be located only on the landfill cap; and eliminate the restriction to “sanitary” landfills. This would encourage additional development on these sites.

C. Brownfield Preferred Site

As for the brownfield preferred site category, renewable energy developers report to REV that brownfield sites are being avoided for the same reason they are being avoided by developers of other projects – the potential that the site operator will be subjected by the State to environmental liability for past contamination. Without some additional “safe harbor” for developers, increased development on brownfield sites – particularly unremediated sites – is unlikely.

D. Community Solar Preferred Site

Community solar projects, defined as larger net metered projects (typically 150KW or 500KW) with 50% or more of the off-take accrued to residential customers (who might not have a good site for solar or who don’t have the capital or borrowing ability for onsite solar), allow a more diverse demographic of people to participate in renewable energy. The Commissions current net metering rule virtually eliminated this self generation choice and energy option in Vermont. Without projects like these, many Vermonters are left out of the benefits of shifting to renewable energy. Community solar, as defined above, should be a preferred site in any new rule changes.

In addition, to truly make the benefits of renewable energy accessible to low and moderate income (LMI) Vermonters, there needs to be a way for community solar projects to offer net metering benefits to LMI Vermonters with reduced or no buy in costs. An extra adder for LMI community solar projects would create this incentive – for example, in exchange for this extra adder, the project developer would be required to offer LMI Vermonters net metering credits at a discount, which would increase as the household income percent of the federal poverty line decreased. REV recommends creating a preferred site designation for residential community solar.

III. ADDITIONAL COMMENTS

REV asks the Commission consider the following comments:

¹⁸ REV members have also reported to REV anecdotally that the sanitary landfill preferred site criteria is being avoided by owners of closed landfills because the potential compensation in the form of relatively modest lease payments is far outweighed by the perceived risk of inviting the Agency to review a dormant site.



- The 15kW registration ceiling is too small for modern home needs (heat pumps, multiple electric vehicles, etc). The Commission should consider raising the limit to 30 kW.
- The Net Metering Registration Form should make clear the different information required from residential and commercial customers. Changes that do not constitute more than a 5 % difference in electricity output (such as panel type or model number) should not be considered necessary filing amendments.
- As part of its bi-annual review the Commission should request from utilities a robust data set that includes dates of application and interconnection of all net metering projects with corresponding data regarding size, interconnection costs and upgrades required, and which net metering rates are being applied.
- Incorporate resiliency and energy storage values.

REV appreciates the opportunity to provide these comments to the Commission.

Respectfully submitted,

Olivia Campbell Andersen
Executive Director