

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 20-0097-INV

In re: Biennial update of the net-metering program	
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**THE DEPARTMENT OF PUBLIC SERVICE'S COVER LETTER TO ITS
REPLY COMMENTS FOR THE NET-METERING BINENNIAL UPDATE**

The Vermont Public Utility Commission (“Commission”) opened this biennial update on January 16, 2020, and directed Vermont’s distribution electric utilities to file “the number of net-metering systems interconnected with as well as *proposed for interconnection* with the electric company’s distribution system during the past two years...” (*emphasis added*). By this cover letter the Department of Public Service (“Department”) recommends that the Commission order a stay on these proceedings and provides its accompanying reply comments.

On March 9, 2020, Green Mountain Power Corporation (“GMP”) filed updated and revised comments in this proceeding to include net-metering systems that had applied for interconnection but had not yet been interconnected as of the end of 2019. The Department of Public Service (“Department”) filed revised comments which incorporated the data from GMP’s updated filing on March 16, 2020. On or about that date, various stakeholder made comments based on the initial filings of the Department, the Agency of Natural Resources, and Vermont’s retail electric distribution utilities.¹

¹ The Department notes that many of the comments submitted were in response to the Department’s original March 2, 2020 filing, and not its March 16, 2020 revised filing. As explained in the Department’s revised filing, GMP’s February 4, 2020 filing included the number of systems interconnected in 2018 and 2019 – but did not include systems that had applied for interconnection

The Department's comments, and its reply comments submitted alongside this letter, are provided based on the data provided in this proceeding. This data does not account for financial consequences stemming from the ongoing COVID-19 pandemic. Among the harms stemming from this outbreak are many negative economic impacts. The duration and extent of these impacts is not currently known.

The Department is aware that new solar installations have been deemed non-essential activities and are not being allowed to continue for the duration of Executive Order 01-20, Addendum 6 (March 2020).² Currently, these guidelines are due to expire on April 15, 2020. However, it is possible that this directive will be extended. The Department understands that some solar installers may request a waiver of the procedural timelines contained in Commission Rule 5.128. Under Commission Rule 2.107, the Commission may waive its Rules unless otherwise precluded by law "to prevent unnecessary hardship or delay . . . or for other good cause." The Department agrees that the uncertainty regarding the impact of the

in 2018 and 2019 but had not interconnected by the end of 2019. Therefore, the summary of applications presented in the Department's original filing was incorrect and provided an incomplete picture of net-metering deployment trends. As such, the Department would support the opportunity for additional comments in consideration of these revised filings.

² Exec. Order No. 01-20, Addendum 6 (effective Mar. 25, 2020 until Apr. 15, 2020) *available at* <https://governor.vermont.gov/sites/scott/files/documents/ADDENDUM%206%20TO%20EXECUTIVE%20ORDER%2001-20.pdf>. *See also* AGENCY OF COMMERCE & CMTY. DEV., *Stay Home Stay Safe Sector Specific Guidance* (2020), *available at* <https://accd.vermont.gov/content/stay-home-stay-safe-sector-specific-guidance>, ("The Agency [of Commerce and Community Development] directs that all other non-essential, in-person business operations cease, to include new commercial and residential solar and the installation of new commercial or residential heating, ventilation, and cooling systems in new construction.").

pandemic on the economy and on solar installations warrants a stay in these proceedings until further information is available.

Thank you for your attention and consideration, please do not hesitate to contact me with questions or concerns.

Dated in Stowe, Vermont on this 1st day of April 2020.

/s/ Alex Wing
Alexander Wing, Special Counsel
Department of Public Service

cc: ePUC Service List