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Clerk of the Commission
Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620

Re: **Case No. 19-0856-RULE**
Proposed revisions to Vermont Public Utility Commission Rule
5.500

Dear Clerk of the Commission:

This letter is in response to the Commission's March 19, 2021 Notice of Workshop which requested that stakeholders who would like to make a presentation at Workshop make a filing in this case by no later than April 9, 2021.

The Interstate Renewable Energy Council, Inc. (IREC) is a 501(c)(3) non-partisan, non-profit organization working nationally to build the foundation for rapid adoption of clean energy and energy efficiency to benefit people, the economy and our planet. In service of our mission, IREC advances scalable solutions to integrate distributed energy resources (DERs), e.g., renewable energy, energy storage, electric vehicles, and smart inverters, onto the grid safely, reliably, and affordably.

IREC works across numerous diverse states to improve the rules, regulatory policies and technical standards that enable the streamlined, efficient and cost-effective installation of DERs. The scope of our work includes updating interconnection processes to facilitate deployment of DERs and remove constraints to their integration on the grid. IREC develops and disseminates thought-leading regulatory policy tools (e.g., model rules, guidebooks, scorecards, briefings, and quarterly digests) that identify and facilitate the adoption of policy best practices. IREC has participated in regulatory proceedings and/or advised state commissions and stakeholders on interconnection policy improvements in over 30 states and at the Federal Energy Regulatory Commission. IREC publishes Model Interconnection Procedures which document best practices in distribution interconnection policy. These Model Procedures are utilized regularly by Commissions and stakeholders as they look to adopt and/or update interconnection rules.

Stakeholders in Vermont have indicated that it might be helpful for IREC to present some of our national expertise on interconnection policy and best practices at the upcoming workshop on April 19th. IREC is thus submitting this letter to indicate our willingness to present at the upcoming workshop.

If desired, IREC could present on the following topics:

1. Introduction to model interconnection procedures, pros and cons associated with using models and an overview on the different models available for consideration and their distinct benefits and drawbacks.
2. Overview of the most critical issues in interconnection policy today, including:
 - a. How to design interconnection procedures for energy storage systems that recognize their distinct characteristics and enable their beneficial use while also maintaining safety and reliability.
 - b. Process for and benefits of adopting the latest IEEE 1547-2018 and associated standards.
 - c. Grid transparency tools, such as pre-application reports and Hosting Capacity Analyses, what they are useful for and how they can be adopted and utilized.
 - d. Current best practices on how to appropriately screen interconnection projects for system impacts, including recent innovations and evolutions in the screens.

IREC could provide a high-level overview of these topics in 25 minutes, if a longer or more in-depth presentation on any of these topics is desired IREC would be open to discussing an appropriate timeframe with the Commission.

IREC has not yet prepared materials for this presentation but would be happy to share those when they are complete.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



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