

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

CASE NO. 19-0855-RULE

PROPOSED CHANGES TO PUC RULE 5.100

July 27, 2021
9:30 a.m.

Via GoToMeeting

Workshop held before the Vermont Public
Utility Commission, via videoconference, on July 27, 2021,
beginning at 9:30 a.m.

P R E S E N T

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1 MR. MARREN: All right. We will go on
2 the record and begin today's workshop. Good morning
3 everyone. This is a workshop in Vermont Public
4 Utility Commission Case No. 19-0855-RULE. It's a
5 workshop regarding the net-metering rule and
6 specifically issues related to the Sheffield-Highgate
7 export interface.

8 My name is Jake Marren. I'm staff for
9 the commission. With me from commission staff are
10 Mary Jo Krolewski and Elizabeth Schilling and Rowan
11 Cornell-Brown. Also we are joined today by our three
12 commissioners: Chair Anthony Roisman, Commissioner
13 Margaret Cheney and Commissioner Riley Allen. They
14 will be participating in today's workshop as well.

15 There are quite a few number -- quite a
16 few people participating in today's workshop, so I'm
17 not going to ask other people to introduce themselves
18 at this time. But I do request that when it comes
19 time for the group to speak, please make sure your
20 camera is turned on if you have that ability. And
21 state your name and the organization you're
22 affiliated with for the court reporter's benefit.
23 And also try to, you know, not over -- you know,
24 speak over each other. We do have a chat function,
25 and we will be watching that if you have a question

1 and you want to throw it into the chat function,
2 that's a good way to sort of get in the queue. And
3 we will get to your question or your comment in an
4 orderly fashion.

5 If for some reason you lose
6 connectivity during today's workshop, you can, you
7 know, try to rejoin, but if you're not having luck,
8 you can contact the clerk of the commission at 802-
9 828-2358, and we will work with you to try to get you
10 reconnected.

11 Also there is a court reporter today
12 transcribing today's workshop, and the slides will be
13 posted online. So hopefully with that, you should be
14 able to keep abreast of what's going on.

15 So a brief overview of the agenda for
16 today's workshop. We are going to start with just a
17 little bit of background information. Staff is going
18 to run through the procedural events that have led us
19 to where we are today, and go over the department's
20 proposal for SHEI mitigation fee. The department
21 offered kindly in comments submitted last week to
22 answer some questions about its proposal, and I think
23 we do have a few. After we get that sort of
24 background information out there, we are going to
25 talk about some implementation issues related to the

1 fee and how -- if you're joining us by phone today,
2 please make sure you're on mute. Thank you.

3 I was just saying we will discuss some
4 implementation issues related to how we could get a
5 mitigation fee into our net-metering rule if that's
6 the direction the commission decides to go. We will
7 also talk about some other potential changes to the
8 net-metering rule related to the SHEI and constraint
9 issues.

10 And then at the end of this we will
11 talk procedurally about what next steps to take to
12 move this case forward. So, procedural background.
13 I'm not going to read this long slide to you, but I'm
14 going to -- I'm sure as many of you are aware,
15 several cases have led us to where we are today.
16 Back in 2019, the commission denied an application
17 for a 500-kilowatt net-metering system that was going
18 to be located in Derby which is in the northern part
19 of the state where there is the Sheffield-Highgate
20 export interface. And the commission denied the
21 project finding that the project could not be
22 economically served by the existing transmission
23 system. And that also it was inconsistent with the
24 state's Comprehensive Energy Plan.

25 That decision was later upheld by the

1 Vermont Supreme Court. And as a result of that,
2 there was a sort of a slow down in development of
3 some projects that were already proposed in that area
4 and also, you know, new projects. The department
5 worked with stakeholders, including developers and
6 the utilities, to try to come up with a way to
7 facilitate the continued development of some projects
8 up there, but while avoiding the harms that were
9 identified by the commission in its order.

10 And that resulted in the petition. It
11 was filed in Case No. 20-3304-PET where the
12 department proposed a mitigation fee. And we have an
13 uncontested proceeding to review that proposal. And
14 we will talk about the substance of the proposal in a
15 second, but just sort of procedurally we had a couple
16 workshops, we had several rounds of written filings,
17 and folks were allowed to ask questions of the
18 utilities about how they had arrived at the
19 calculation of the proposed fee. Staff's sort of
20 characterization of that proceeding was helpful. It
21 was good to get that information out there.

22 There seemed to be a general consensus
23 that a few could address some of the economic impacts
24 addressed -- associated with new generation in the
25 SHEI. But there were questions about how best to

1 implement it. And I think that there was -- the
2 larger view was that a rulemaking was the most
3 appropriate way to go forward. So we are here in the
4 net-metering rule.

5 I want to make clear though that the
6 commission has not decided whether to adopt the
7 department's proposal. Participants should feel free
8 to advocate for or against the proposal or for
9 modifications to the proposal.

10 In today's workshop we are trying to
11 focus mostly on implementation though. If the
12 commission did decide to adopt a fee of some form,
13 how would we do it? What kind of things do we need
14 to be thinking about and putting into a rule to
15 accomplish that?

16 And then, like we have said, there may
17 be other changes to the rule that are necessary to
18 address SHEI issues. So in addition to the fee,
19 there could be other changes, and we will discuss
20 those during today's workshop.

21 So just to quickly review the
22 department's proposal. Thank you, department. It
23 was a pretty straightforward and simple proposal in
24 my estimation. It was a \$75 per kilowatt fee. It
25 was going to be collected up front at the time of

1 application and then those revenues would be
2 distributed to the utilities affected by curtailments
3 of existing generation in the SHEI.

4 At this time I'm going to turn the
5 slides off, and I think some of the commissioners may
6 have some questions for the department about the
7 proposal. And also after the commissioners are
8 finished, we can open it up to anyone else who is
9 participating in today's workshop to ask questions of
10 the department about their proposal.

11 So with that, Commissioner Allen, I
12 think you had expressed to me that you have some
13 questions, so I'll let you go first. And then people
14 can raise their hand or put them into the chat if
15 they want to ask more questions of the department at
16 this time.

17 MR. ALLEN: Okay. Can you hear me
18 okay?

19 THE COURT REPORTER: I can.

20 MR. MARREN: Yes, I can. Thank you.

21 MR. ALLEN: So my questions -- I don't
22 really know if my questions are directed to the
23 department, to Green Mountain Power, or to Vermont
24 Electric Co-op. But my questions really concern
25 scope. What is, you know, if you will, kind of

1 included versus what is not included within the scope
2 of the proposal. It's not so much that I have a
3 concern with what is being put on the table, but I
4 just wanted to be clear if there were other things
5 that are kind of also impacts -- relevant impacts
6 that we should, you know, consider for the future, if
7 you will. So I'll just kind of run through them.

8 The first, I guess, is that there is
9 kind of a -- there is a potential LNP impact
10 associated with, you know, the further additions to
11 the net-metering frame and the SHEI area. And I'm
12 not sure if that's kind of a net benefit or a net
13 harm to any interests in Vermont. But if there is, I
14 would like to at least be aware of that.

15 The second is with the addition of --
16 additional kind of net metering or distributed
17 generation, within the SHEI area, there is, you know,
18 potentially a growing need to address, you know, the
19 challenges within the region that might precipitate
20 the need for, you know, a transmission -- a bulk
21 transmission fix or transmission fix, or maybe even
22 distribution fixes along the line, and that challenge
23 may be growing over time.

24 And my perception is that's not really
25 what the department's straw proposal is about. It's

1 really about addressing the, you know, lost revenues
2 that -- or other -- or associated harms to
3 ratepayers.

4 And the third thing that comes to mind
5 is the fact that the areas outside of the SHEI area,
6 we are talking about the SHEI area, and I know that
7 in VELCO's plans they have been talking about the
8 growing footprint of the SHEI area. And that, you
9 know, with the addition of net-metered or distributed
10 generation in the SHEI area, or beyond, there may be
11 a growing risk that the problem or the footprint is
12 going to be expanding.

13 And I just want to be clear that, you
14 know, the proposal that we have on the table is not
15 addressing that. So my question is really do I have
16 that right, or am I not seeing the problem clearly?

17 MR. McNAMARA: So this is Ed McNamara,
18 Planning Director with the Department. I'll take a
19 first swing at the answers, and then I think some of
20 the folks from GMP, VEC and potentially VPPSA, might
21 want to weigh in as well.

22 With respect to the scope, just to make
23 sure I understood -- well Mr. Allen can correct me if
24 I didn't -- I didn't fully answer the question. The
25 proposal is meant to mitigate all economic harms.

1 There is two utility-owned projects and a number of
2 projects within the SHEI that have long-term PPAs,
3 and therefore, reduced economic benefit associated
4 with those PPAs as more generation is added in the
5 SHEI.

6 There are at least one or two utilities
7 that do not have generation within SHEI, and do not
8 have any PPAs associated with generation in SHEI, and
9 those handful of small utilities actually receive a
10 benefit through SHEI because of the lower LNP in that
11 area. The lower LNP is a benefit to all the other
12 utilities as well.

13 However, the economic harm associated
14 with reduced benefits of the contracts or utility-
15 owned projects outweighs that reduced LNP. So I
16 think that answered your first question about the LNP
17 impact.

18 Second, growing need to address
19 challenges. So the proposal was not meant to -- the
20 proposal was simply meant to address the economic
21 harm associated with new generation within SHEI. It
22 was not meant to provide a long-term fix. Just as a
23 side note, the department is aware that some, VELCO,
24 I believe with some other utilities, has put in a
25 proposal for federal funds through the recent

1 infrastructure act, excuse me, infrastructure bill
2 that would identify, I believe, at least one of the
3 transmission lines in SHEI for potential upgrades.
4 Somebody can correct me if I got that wrong.

5 I will note from the department's
6 perspective, that would help address the impact, the
7 level of the adjustor. I'm not sure it would get rid
8 of the need to have an adjustor in SHEI. It's not
9 clear at this time. It's not clear whether Vermont
10 would be getting the money to upgrade the lines, and
11 it's not clear what the scope of the mitigation would
12 be, even if the money was used and the line rebuilt.

13 MR. ALLEN: So Mr. McNamara, can I just
14 interrupt you briefly there. I just want to be clear
15 on something. So apart -- I mean putting apart the
16 issue of federal monies that might become available,
17 it seems to me that the challenges that we are seeing
18 associated with the additions of additional
19 distributed generation are, in essence, kind of
20 precipitating a future need for some sort of
21 infrastructure project. And the more additions or
22 the, you know, well the more additions of projects to
23 the area seems to me that the infrastructure project
24 in the future is potentially going to grow larger,
25 the challenge grows bigger, and that it's a ratepayer

1 issue. But it's not an issue that I think is within
2 the scope of the proposal. To be clear, this is not
3 a criticism. I just want to be clear on what is kind
4 of in and what is not included within the frame of
5 the department's straw proposal.

6 MR. McNAMARA: Yup. So it is not
7 within the scope of the department's proposal. The
8 idea of future transmission needs. In part, the
9 department expects that sending correct price signals
10 to areas where distributed generation can be more
11 harmful than beneficial will help push back the
12 potential need for transmission and attendant
13 ratepayer costs.

14 Lastly, your question regarding areas
15 outside SHEI, I think there is two components of
16 that. One is, as you noted, there is a potential for
17 SHEI to expand. I will note that VELCO's most recent
18 published long-range transmission plan does not
19 include the same graphic as the one three years ago
20 that showed SHEI boundaries heading south. Talking
21 with folks from VELCO, it's -- VELCO did not include
22 that because they were worried that that original
23 graphic created the expectation that there would be
24 an orderly progression and change associated with the
25 SHEI boundary, and depending on where other

1 generation is placed within Vermont load, that
2 instead of SHEI I, which goes slightly south, it
3 could immediately jump to SHEI III, which would be
4 dozens of miles farther south and encompass a
5 significantly greater area.

6 So with respect to the department's
7 proposal, we would suggest and VELCO has agreed that
8 they would be willing to look at the current
9 boundaries of SHEI. It's not clear yet exactly how
10 we would take into account the need for -- on the
11 edge of those boundaries, to ensure that essentially
12 we didn't skip the boundaries farther south than we
13 wanted to. The identification of the boundaries is
14 an issue, and I would suggest at some point, I don't
15 see anybody from VELCO on the line, but it would
16 probably be useful to include VELCO in some of those
17 conversations.

18 And sorry for talking so long, but then
19 the last answer is, I think, non-SHEI related areas
20 where there is large amounts of distributed
21 generation that might foster the need for
22 transmission upgrades even absent SHEI, that is
23 something that -- there is a potential for a grid
24 adjustor to be developed within the net-metering
25 rulemaking.

1 The department also believes that
2 depending on how the interconnection rulemaking goes,
3 if there is clustering -- cluster study requirements
4 embedded in the interconnection rule, that might
5 obviate the need for a grid adjustor in these non-
6 SHEI constrained areas as well, and the department
7 would be concerned about duplicating -- essentially
8 duplicating price signals, one through the net-
9 metering compensation through an adjustor, and
10 another through the need to pay in for a cluster
11 study.

12 That's all I have. I know other folks
13 have been pretty heavily involved in this, so I'll
14 stop talking for a little bit.

15 MS. CHENEY: I had a question related,
16 Mr. McNamara, to what you were saying. And the
17 number that the department has proposed is very
18 specific. And common sense would say that that
19 number could and probably would change over time as
20 factors change as more generation comes on.

21 So can you envision a way that specific
22 number could be more malleable? Or should it be a
23 formula? I mean we don't -- one doesn't necessarily
24 or regularly put specific numbers into either
25 legislation or rules. So how would you attack that?

1 MR. McNAMARA: Yup. Great question.
2 And I would say as distributed -- more distributed
3 generation goes into the area, the impacts will
4 increase. And conversely, as more electrification
5 hits the area, that number should go down. There is
6 lots of different factors -- apologize -- there is a
7 train coming through. I hope it doesn't drown me
8 out.

9 The department would recommend that --
10 not a specific number, the dollar amount be in the
11 rule. Instead that there be a methodology and a
12 process for updating that number. The department
13 recommended every two years or up to 10 megawatts,
14 whichever one comes first. And I did note, and it
15 looked like David Carpenter noted the impacts
16 associated with the B20/B22 line -- subtransmission
17 line upgrades that I believe GMP has recently
18 finished, or if not finished, hopefully it will be
19 finished soon.

20 And it looks like Doug Smith is willing
21 to respond. I'm going to stop talking and let him
22 respond.

23 MR. SMITH: Hi folks. Doug Smith,
24 Green Mountain Power. Just a couple things. Great
25 conversation going.

1 First, on the most recent question that
2 Mr. McNamara was alluding to, the one about GMP
3 upgrades. So yes. There is a set of upgrades known
4 collectively as Lowell to Morrisville, which
5 primarily GMP, although supported by a couple of
6 Vermont's municipal utilities as well, is underway on
7 and pretty deep in the construction process. So that
8 is progressing along and will -- there is always some
9 uncertainty and potential lag to get physical
10 upgrades reflected in the ISO New England
11 administered limits. It's not a simple study
12 process. And frankly, they have other interfaces to
13 administer, ISO does. But fundamentally, we envision
14 and expect that in the near term, whether that be
15 later this year or next year, but sometime in the
16 glacial sense soon, that those upgrades will
17 meaningfully reduce the level of congestion that's
18 been seen in the SHEI area.

19 I think Mr. McNamara is right though,
20 that that's not the end. That to the extent future
21 generation in the area is deployed, some of the, call
22 it lead room, that's established between the amount
23 of power that can be exported and the amount of
24 generation and load inside the area that will be
25 eroded. So it's not -- the SHEI area isn't solved in

1 a long-term sense by these upgrades. But they should
2 really take the edge off financially in terms of
3 their effect on Vermont customers.

4 I also just wanted to support -- there
5 was a brief exchange with Ms. Cheney and Mr. McNamara
6 about sort of the uniqueness of these adjustors. I
7 guess I just wanted to pitch in the notion that the
8 cost to Vermont customers can vary quite a bit based
9 on the facts and circumstances of a certain area.

10 Mr. McNamara hit it on the head that
11 the issue for Vermont customers in the SHEI area,
12 that there is quite a bit more generation than load.
13 In other circumstances, that might not be the case.
14 There might be more of a balance between generation
15 and load so that the financial cost of congestion to
16 Vermont customers would be less. Where I'm headed is
17 to support -- I don't remember his exact words, but
18 Mr. McNamara's comment that the -- it seemed logical
19 that a rule would give the commission hopefully a
20 tool to examine the impacts or potential costs that
21 could be associated with more generation in a given
22 area. But to assess those on an area-specific basis,
23 I have doubts that a formula or a prescriptive method
24 would be easily applied. And I think that's okay.
25 But it may take a thoughtful look and some evidence

1 to understand the implications and the -- whether an
2 adjustor is warranted for different geographic areas.
3 Thank you.

4 CHAIRMAN ROISMAN: Anthony Roisman. I
5 have a question for you, Mr. Smith, in light of your
6 last answer. Do you foresee the commission holding a
7 hearing every time a new facility is proposed in the
8 SHEI area in order to set the precise number that
9 should be paid to the utilities? Given that in
10 different locations around the SHEI the impact of say
11 a new 500-KW solar project could be different,
12 economically different. And if so, what kind of
13 process are you proposing here? And how many of
14 these -- I mean are these like going to be mini rate
15 proceedings that the commission will have to hold to
16 set what this dollar number is going to be?

17 MR. SMITH: My short answer -- it would
18 be ouch. No, I think the -- no. That would be an
19 inefficient way, and it's reminiscent, frankly, of
20 what you all, the commission and a number of
21 stakeholders went through in Derby Solar. The hope,
22 my hope, would be, and I think -- I'm sure it's the
23 department's hope, would be that a process could be
24 established. The department's strawman adjustor is
25 an example, where reasonable approximations are made

1 to reflect the impacts within some logical geographic
2 area.

3 To your question, that \$75 per KW
4 adjustor figure that the department put in the
5 strawman does, as your question suggests, contain
6 some approximations and aggregation of sort of the
7 average effect, if you will, of projects located
8 within the SHEI area. To GMP's view, that
9 approximation is close enough. And it would not be
10 warranted to go further and distinguish, for example,
11 the impacts of a net-metering project that's located
12 in the east or west of the SHEI area, for example.
13 Rather, better to focus on where the big areas are,
14 the big boundaries like SHEI, or perhaps there is a
15 major upgrade identified in VELCO's long-range
16 transmission plan that implicates a geographic area,
17 focus on the big stuff hopefully, and make
18 approximations that are reasonable within.

19 CHAIRMAN ROISMAN: Let me talk about
20 that. I want to make sure that I understand what
21 you're proposing.

22 It sounds like what you're proposing
23 will work well for the utility. But I'm not sure how
24 well or how you are protecting the rights of the
25 developer.

1 If the developer is located in the
2 center of where the greatest impacts are, they are
3 going to find the numbers acceptable. If someone's
4 at the edge, they are not going to find that number
5 acceptable because they are going to argue we have
6 the opportunity, we should have the opportunity, to
7 show you that we aren't going to cause as much
8 backing out of the -- of Lowell or Sheffield as
9 somebody in a different part of the area or even
10 arguing about whether they are truly in the SHEI.

11 We don't yet have, no one has given us
12 yet, a clear set of boundaries. It's not like you
13 can say it's latitude this, and longitude that, and
14 that gives you the boundary. It moves. It shifts.
15 As new electrification comes in it's going to be
16 different. As new supply comes in it's going to be
17 different.

18 What are you suggesting is the way that
19 this proposal is protecting the developer? Assuming
20 they are not willing to just say oh, we will just pay
21 it. And don't argue about it. They might pay more
22 than their fair share. How are you suggesting they
23 should be protected?

24 MR. SMITH: It's a legitimate point.
25 My brief answer would simply, I guess be, yes. These

1 are legitimate concerns. And stakeholders including
2 developers should have the opportunity to review and
3 comment and provide evidence if an adjustor is being
4 proposed for a certain area.

5 I'm just saying that an ideal outcome
6 and a real benefit from an adjustor like a department
7 straw proposal is that if it's found to be
8 acceptable, reasonable approximations, it gets out of
9 that project specific litigation, if you will, that
10 your question started with. But clearly, are the
11 approximations reasonable? They are used in a
12 certain area. A party should have the chance to
13 weigh in about it.

14 MR. McNAMARA: Chairman Roisman, if I
15 can chime in here, I would say just and reasonable
16 does not require absolute precision. For example,
17 when setting the customer charge for GMP customers,
18 you don't look at if you live in a rural area, the
19 tree trimming costs are significantly higher than if
20 you live in an urban area. There is not different
21 tree trimming costs assigned to different customers.
22 So -- and that's been a longstanding practice for a
23 hundred years.

24 Of you take just and reasonable can
25 mean you can take an average, and that can be okay.

1 And so the customer -- the interconnection customer,
2 the developer, can opt to challenge that average fee
3 adjustor, whatever, and have the onus of advocating
4 for a lower one if they want. The same way that
5 somebody who is not a net-metering customer, if it's
6 a 5-megawatt or a 20-megawatt project, this wouldn't
7 apply. They would have to come up with their own
8 mitigation.

9 So the idea is to actually simplify and
10 provide something so that you allow for more growth
11 instead of fighting every single project regardless
12 of the area, which the department's proposal is to
13 try to come up with a more streamlined, efficient
14 process for all involved. And overly focusing on
15 precision, I think, will actually bog it down, and
16 increase the amount of litigation involved.

17 CHAIRMAN ROISMAN: All right. So let
18 me follow up on that, Mr. McNamara. It seems to me
19 that instead of -- at least we should be considering
20 that instead of the commission adopting a rule, we
21 should simply say the developers, the utilities,
22 VELCO, if necessary, should work out a deal. And if
23 they come to us with a deal and say we are happy this
24 time we are going to pay 86,000, next time we are
25 going to pay 55,000, and negotiate it, that that is

1 the most efficient way to do it. It keeps us from
2 having to use a lot of administrative process to hear
3 somebody complain that they are being asked to pay
4 more than they should have to pay based upon your
5 average.

6 And this isn't like tree trimming.
7 This is a lot of money. And it's a lot of money
8 which is -- could fall on an individual, not just on
9 the developer, but on the parties who are going to be
10 using the power that's coming from that developer's
11 project in terms of what they have to pay in order to
12 get the project put together. Why shouldn't we just
13 let you guys work it out in each case instead of
14 trying to have a generic rule?

15 MR. SCHILLING: Mr. McNamara, before
16 you respond -- sorry. Mr. Carpenter made a comment
17 in the chat. And I just was wondering if he wanted
18 to make that comment on the record since the chat
19 function is not part of the record. Mr. Carpenter?

20 MR. CARPENTER: Yeah, sure. Greetings
21 everyone. Thank you. Was that Ms. Schilling who
22 said that? Hi.

23 So I don't want to jump in here, and I
24 may get -- I may drop off because my internet
25 connection is pretty terrible, which is a different

1 problem for a different day.

2 But I think what we tried to do, we
3 were the developer whose Derby case was decided for
4 us, we worked with Ed and other utility folks, Doug
5 and Craig specifically, over several years.

6 (Technical difficulty)

7 MR. CARPENTER: Let me do this. Let me
8 call in, and then I'll make that comment on the
9 record, if that's okay. So continue on, and then
10 I'll jump back in at some point.

11 MR. McNAMARA: Did you want to wait for
12 Mr. Carpenter to come back, or do you want me to
13 respond?

14 CHAIRMAN ROISMAN: I think it would be
15 useful to hear from you while we are waiting for him
16 to come back on.

17 MR. McNAMARA: Okay. So my response is
18 that while that would be more administratively
19 efficient for the commission, it would be
20 significantly more disruptive to all other parties
21 involved.

22 MS. CHENEY: Excuse me, Mr. McNamara.
23 By "it," what do you mean?

24 MR. McNAMARA: Oh, my apologies. The
25 idea that the department, the utilities, and the

1 developers simply make deals for every single project
2 in SHEI would be extremely inefficient for everybody.
3 It would reduce the case load at the PUC, and it
4 would make life much more challenging for everybody
5 else.

6 And so the department's proposal is
7 that the commission decide on whether or not this
8 process -- whether a methodology for assigning a
9 generic adjustor is reasonable.

10 MR. MARREN: I'll just jump in for a
11 second. This is Jake Marren from the commission
12 staff. Chair Roisman, another thing to consider is
13 that the very small projects, the registration size
14 projects, still are moving forward at this point.

15 And I'm not sure that those types of
16 projects necessarily have the wherewithal to
17 negotiate. They may be single homeowners or small
18 businesses. So, you know, it's one thing to ask, you
19 know, sophisticated development outfits like Mr.
20 Carpenter's office to negotiate a deal. It's another
21 thing to ask individual customers to negotiate a
22 price. So that would be maybe one reason for having
23 a standardized price.

24 CHAIRMAN ROISMAN: Just so we are
25 clear, the individual customer is using the large

1 developers to put in even their small projects. We
2 don't have very many cases in front of us where a
3 private individual is showing up without an installer
4 involved, and at least in a number of those cases the
5 installers are large companies that install hundreds,
6 in some cases thousands, of these projects throughout
7 the state.

8 But I'm not urging that we go in this
9 direction. I'm simply trying to find out -- I mean
10 we are hearing from Mr. Carpenter about one very
11 large developer, a very large project. I would be
12 really interested to hear from anybody who is
13 participating in the workshop who do small projects
14 and whether or not they and their customers are
15 comfortable with the commission setting a one-size-
16 fits-all number. And if they are, then that's fine.

17 What I'm -- what I would like to not do
18 is -- it seems to me -- is to turn it into every
19 single case becomes a rate making proceeding in which
20 we have to decide how much the payment is going to be
21 for this 150-KW project that's located in the east
22 side of the SHEI, and that one that's located on the
23 west side. And this one that's located in an area
24 that maybe isn't in the SHEI.

25 I think that is not an efficient use of

1 anybody's resources. But I would like to hear from
2 the little developers -- the developers of the little
3 projects, but I would also like to hear Mr.
4 Carpenter's comments.

5 MR. CARPENTER: So am I live? I see
6 nodding. That's better. I've got my giant air
7 traffic controller headset on now, so I think I
8 should be okay. I appreciate the opportunity to
9 speak to you all.

10 So Green Lantern obviously was sort of
11 first out the door, first out of the landing craft
12 and onto the beach and suffered a fate, excuse me, on
13 the Derby project. We then spent several years
14 working with Ed McNamara, Craig Kieny and Doug Brown
15 -- Doug Smith rather. Doug Brown. To try to come up
16 with a way to come to a settlement.

17 And I don't know how many of you were
18 following along, but there were thousands of pages of
19 legal briefs and filings, and it was a very
20 inefficient way to move forward. And I'm not -- I
21 don't want anybody to take this the wrong way,
22 because we were at loggerheads with the utility, VEC,
23 and, you know, Craig obviously has the -- can respond
24 to me on this, and I'm not trying to be argumentative
25 at all. But it was years and years and years of

1 litigation. Thousands and thousands of dollars and
2 hours. And trying to get to a point where we could
3 agree.

4 I think the impetus for agreement at
5 the end of the day was the department's proposal
6 which sort of helped us triangulate on what a
7 reasonable number might look like, and ultimately we
8 ended up entering into an MOU with the utilities, and
9 just had one of the CPGs for these four state SHEI
10 projects issued. And I believe Aegis, which was
11 another developer in the SHEI, also had a CPG issued
12 recently as well.

13 So we did manage to resolve the issue,
14 but it took an awfully long time and an awful lot of
15 litigation. I think what developers want more than
16 anything, this is speaking for my company and nobody
17 else's, is a level of certainty and a sense of that
18 rules are being applied fairly.

19 Because during the interim, four or
20 five years or three years, however long it was, it
21 seemed like an awfully long time, about 5 megawatts
22 worth of additional net metering went into the SHEI.
23 And those were all small projects, under 150
24 kilowatts, most of them small, of the sizes that
25 Commissioner Roisman was talking about, that have the

1 exact same impact as ten 500-kilowatt projects.
2 Because they dump power in exactly the same way that
3 a large solar project would. They are just a bunch
4 of little ones. Maybe some -- you know, some
5 percentage, I believe, less efficiency because they
6 are on roofs and so on and so forth.

7 At any rate, it's a lot -- a lot of
8 additional generation went into the SHEI during that
9 time. And there was no mitigation fee paid by any of
10 those folks. And look, I understand that there is a
11 problem, and that it is easier to put it on the
12 larger developers. But if the problem is congestion
13 in the specific area that everybody is contributing
14 to, then rather than having to litigate every one of
15 those or litigating only those above a certain size
16 because they are an easier target, I guess, doesn't
17 really fix the problem. It doesn't really address
18 the problem.

19 So for every kilowatt that goes on the
20 grid, it has virtually the same impact as any other
21 kilowatt that goes on the grid from a congestion
22 perspective. So that's what developers are looking
23 for, and I don't want to speak for smaller developers
24 because a lot of developers that do residential are
25 much smaller than we are. They don't do commercial,

1 industrial-sized 500-kilowatt projects.

2 And so, you know, I don't know that
3 there are any of those smaller developers on the
4 line, but it would absolutely be interesting to hear
5 from them. But the idea of a per kilowatt adjustor
6 that addresses the impact proportional -- in a
7 proportional way certainly seems to make a lot of
8 sense. And during the 3304 proceedings, you know,
9 the suggestion was made that it be a tariff, not
10 unlike the TGFOB tariff that was implemented, rather
11 than a specific rule that the commission would come
12 up with a specific dollar figure, but it would be
13 almost like a biennial net-metering review to
14 determine what those adjustors might look like, what
15 the tariff might look like.

16 So that's really the only point that I
17 really wanted to make is that a generally applicable
18 rule should be applied across the board. Developers
19 want certainty. We can build those, you know, issues
20 into our pro formas and our internal modeling if we
21 know what they are. But having a floating sort of
22 discussion about every single one of these and what
23 the impact is is hard to imagine being efficient for
24 anybody on either side of the development.

25 MR. KIENY: Jake, this is Craig Kieny.

1 Can I chime in here?

2 MR. MARREN: Absolutely.

3 MR. KIENY: First of all, I'm happy to
4 say that I agree with everything that David just
5 said. I believe that the value of the DPS proposal
6 is that it does provide certainty, although I
7 recognize the point of Commissioner Roisman that not
8 every specific project is equal. I think on average,
9 we tried to arrive at something on average work.

10 I also agree that the DPS proposal was
11 the impetus for the solution to the state project
12 primarily because it gave us boundaries with which to
13 work in. And even if we were to negotiate with every
14 developer, we still need boundaries like that so that
15 we knew what the -- what the universe of our
16 discussion should be, you know, and some idea what
17 the PUC would approve.

18 And then lastly, being the person that
19 would have to negotiate with all these, I appreciate
20 the observations of everybody else that it would be
21 inefficient. Thank you.

22 MR. MARREN: Thanks, Mr. Kieny. Just
23 to keep sort of rolling on our agenda here, I want to
24 -- we had started this conversation as just sort of a
25 chance to review the department's proposal and sort

1 of get any substantive questions about the proposal
2 out of the way.

3 We have already sort of anticipated the
4 next subject which is the implementation issues. You
5 know, how often do we review it, and things like
6 that. We are going to talk about that in a second.

7 I want to swing back and make sure that
8 anyone who had a question about the department's
9 proposal, what it is, how it works, get that out now
10 before we move on to some of the more sort of
11 nitty-gritty about if the commission were to take up
12 the proposal how would we actually get that into
13 regulatory language.

14 MR. ALLEN: Jake, I have one more
15 question that I would like to get out there.

16 MR. MARREN: Sure.

17 MR. ALLEN: I think it's to Mr. Smith
18 and Mr. Kieny. And it's really kind of a follow up
19 to an area that I was asking Mr. McNamara about. But
20 the way I understand the proposal, it's really kind
21 of a lost revenue kind of calculation that they made.
22 Is it fair to characterize it that way?

23 I'll ask Mr. Smith.

24 MR. SMITH: Yes. I think it is. As
25 Mr. McNamara in his -- it's about the LNP effects on

1 load and generation, and to your original question
2 almost at the start of this, I think Ed is also --
3 he's also correct, that our calculations -- the ones
4 that we provided to the department and which support
5 the \$75 per KW figure, those do not, as your question
6 anticipated, those do not assume a -- call it an
7 additional or future capital upgrade, a grid upgrade
8 that might be needed, and which at some point in the
9 future could be larger than just the LNP effects we
10 see today from the interface that ISO New England has
11 established. Yeah.

12 MR. ALLEN: So my question then is
13 would there be -- would we be at risk of double
14 counting costs if we were to kind of somehow mix the
15 infrastructure component with the lost revenue
16 component, that -- that's already kind of captured
17 here?

18 MR. SMITH: Good one. I think yes.
19 There would be a theoretical risk. In other words,
20 if we, for a certain area, if we were to base an
21 adjustor on the estimated cost to implement a
22 substantial upgrade that would clear up the observed
23 congestion, if you will, then it would seem
24 appropriate to keep that in mind, and either reduce
25 or replace the LNP-based computation that I just

1 described.

2 But my sense is that this is the type
3 of thing that although it would be case specific,
4 would be my sense it would be manageable. Just have
5 to keep an eye out for it.

6 MR. ALLEN: Okay. Thanks. That covers
7 it.

8 MR. MARREN: All right.

9 MS. SCHILLING: Wait one second. There
10 are a couple comments in the chat one from Mr. --

11 MR. MARREN: Thank you for watching
12 that, Elizabeth.

13 MR. SCHILLING: No worries. One from
14 Mr. Smith and one from Mr. Nolan, and I wanted to
15 provide them, if they wanted the opportunity to share
16 their comments on the record, before we move on.

17 MR. SMITH: Thank you. Doug Smith
18 here. My comment -- the essence was simply that
19 listening to the thoughtful exchange regarding the
20 setting of locational adjustors, just wanted to
21 inject the notion that my sense of how a successful
22 process could work and what would be procedurally
23 required, my own sense is that it could work
24 similarly to how the biennial reviews today look at
25 the other net-metering adjustors.

1 In other words, taking into account
2 evidence and key themes, but that a rate case level
3 of quality, to pick a term, would not be needed. In
4 order to accomplish the goals that the department led
5 out with at the beginning including, you know,
6 avoiding unnecessary grid expenditures that could be
7 avoided if we thoughtfully locate distributed
8 generation.

9 That's not based in law, if you will,
10 but it feels analogous to me. Thank you.

11 MR. NOLAN: Ken Nolan, Vermont Public
12 Power. I just wanted to expand on the question Chair
13 Roisman had asked.

14 A part that's not visible to the
15 commission in these negotiations is taking the Derby
16 Solar as an example, VEC and Green Mountain Power
17 negotiated an agreement with the solar developer as
18 to what the fee may be. There also had to be a
19 negotiation behind the scenes amongst the utilities
20 as to how those funds are allocated based on the
21 impacts we are all seeing.

22 So one of the benefits we see of the
23 department's proposal is it sets up a standardized
24 process not only for dealing with the developers but
25 allows the utilities to prenegotiate how those funds

1 will be addressed based on our individual situations.

2 And as Commissioner Allen had pointed
3 out before, the VPPSA members have a disparate impact
4 from SHEI. Some of them actually have no generation
5 in the area and see a benefit from the constraint,
6 while others are in the same place as Green Mountain
7 Power and Vermont Electric Co-op where they have
8 generation, and they are actually seeing a negative
9 impact.

10 So each utility is positioned a little
11 bit differently in this discussion.

12 MR. MARREN: Thank you, Mr. Nolan.

13 MR. ALLEN: Jake, I do have one more
14 question.

15 MR. MARREN: Sure.

16 MR. ALLEN: It's probably directed at
17 Mr. Smith and Mr. McNamara. But I mean the straw
18 proposal on the table is kind of an up front, you
19 know, fee, based upon the per kilowatt amount.

20 And correct me if I am wrong, but it
21 seems to me that there is potentially a more elegant
22 way, maybe a more complex and probably
23 administratively impractical, but another way of
24 structuring this that kind of might encourage new
25 projects that come on line and kind of manage their

1 load. You kind of stream the payment over time in
2 some way that kind of encouraged them to align their
3 production with, you know, the risk of curtailment
4 orders that flow. And, you know, obviously coupling
5 the storage over some such thing.

6 That's probably a little bit too out
7 there at this point, but I just want to ask if that
8 was considered and taken off the table because it
9 just was administratively impractical.

10 MR. McNAMARA: So I'll just throw out
11 something. First which is the straw proposal really
12 was meant to just be to garner ideas and create
13 discussion. The upfront fee we recognize is more
14 burdensome for net-metering applicants. And doing
15 something, as Commissioner Allen just noted, is more
16 burdensome for the utilities.

17 And so we threw out sort of the
18 simplest option, but where the department is open to
19 other possibilities of collecting this. It could be
20 simply a reduction in the per KW for a set number of
21 years that adds administrative complexity to the
22 billing. The department is a little bit concerned
23 about trying to time -- trying to align the
24 production timing with SHEI constraints. There are
25 periods where SHEI's constrained for many hours of

1 the day for -- in sort of a known, you know, in the
2 spring a lot of wind, a lot of hydro, a lot of solar
3 all happening. Yeah. There is more likely to be
4 constraints. And then occasionally constraints will
5 pop up for 5-minute increments at a time and go away.

6 And my understanding, and Mr. Smith or
7 Mr. Kieny can correct me on that, is that these small
8 increment constraints were actually fairly prominent.
9 It wasn't just 5 percent of the total constraints.
10 It was actually a significantly higher number. So
11 the department is a little bit worried about the
12 ability to send real-time signal, to respond to that
13 real-time signal in these really small increments.

14 And I would look to Mr. Smith or Mr.
15 Kieny whether I got that last bit right.

16 MR. SMITH: Do you want to swing at
17 that, Craig?

18 MR. KIENY: Sure. I'll take the first
19 part of the question, regarding whether there's more
20 elegant way to do it. From a theoretical
21 perspective, you're correct. But did we consider it
22 at all? For a very, very short period of time, if at
23 all. Because it was clear to me that it would be
24 extremely difficult to implement even if we had all
25 the information.

1 One big problem is that the SHEI is
2 mainly in VEC's territory, but we do not have the
3 information on the congestion until after the fact.
4 We can't -- we don't have the information to see it
5 coming or to -- KCW gets a "do not exceed" signal,
6 but we do not get that signal. So it would be
7 extremely difficult for us to implement.

8 And with respect to Mr. McNamara's
9 comment about the short intervals, I forget now
10 exactly what percentage of time the short increments
11 factor into our analysis, but it was a meaningful
12 number.

13 Doug, do you want to follow up on that?

14 MR. SMITH: Yes. Just briefly. I
15 think Mr. McNamara is right. A couple points. The
16 nature of the congestion in SHEI. This amounted to
17 several million dollars a year, just as you may
18 recall, an order of magnitude or -- of net impact or
19 estimated to Vermont customers. That resided in the
20 last few years. That only represents something like
21 10 percent of the time. I don't think more than 15,
22 that is 85 or 90 percent of the time the interface is
23 not congested.

24 And it is a little bit of wild animal
25 in terms of -- it can be challenging to the applicant

1 when it will occur.

2 Okay. But so to Mr. Allen's comment,
3 it's simply -- I would say GMP's thought was that the
4 approaches that he alluded to are valid. Don't want
5 to write them off. Our judgment was though that the
6 department's proposal had the benefit of simplicity
7 and get something useful on board in a reasonable
8 time frame, call it -- don't let the perfect be the
9 enemy of the good, if you will.

10 My only other comment is some of the
11 tools that Mr. Allen alluded to, I think they could
12 be pursued in a subsequent program. For example, if
13 there were a congested area in GMP's territory and
14 it's costly, okay. Maybe we work that into the
15 controlled load programs or home storage offerings.
16 And that's another use case that could be deployed
17 toward -- I don't think it's either or. Thank you.

18 MR. MARREN: A follow-up question for
19 you, Mr. Smith. Mr. Kieny mentioned that, you know,
20 the ISO New England sends its dispatch signals
21 directly to the plant, like Kingdom Community Wind,
22 but then that signal doesn't get translated to VEC in
23 real time. They get it after the fact.

24 Does GMP have a different level of
25 communication that allows it to receive those ISO New

1 England signals at the same time?

2 MR. SMITH: I guess the short story is
3 we are able to see SHEI congestion in near real time
4 today because Green Mountain Power is the operator on
5 Kingdom Community Wind. So you may recall that
6 colorful chart we had in the memo to the department
7 last fall. We can see basically when the DNE limit
8 on Kingdom Community Wind drops below its potential
9 generation as a signal, as a normal course of
10 business. I think it's possible that we may be able
11 to scrape from other ISO sources a flag of when the
12 SHEI interface is congested and use that as a tool to
13 overcome this barrier.

14 For this morning I'll just say I'm a
15 little rusty, so I'm not going to -- I don't want to
16 be more definitive than that. We might be able to
17 develop another way.

18 MR. MARREN: Is it the case that ISO
19 New England's curtailments apply sort of equally to
20 all generators in the SHEI that they have control
21 over, or is it do they dispatch in economic order so
22 it's like Kingdom Community Wind is being curtailed
23 but the Sheffield wind plant is not?

24 MR. SMITH: Good question. No. A
25 hallmark of the current operating framework or

1 regime, the so-called DNE, or do not exceed
2 framework, is the latter one that you describe.
3 Basically a dispatch function mostly based on the
4 energy offers of if there is an export-constrained
5 area, it's the relative offers for additional energy
6 from generating plants, and that includes renewables,
7 are used to select if a certain amount of energy
8 needs to be backed down to select who that is.

9 There are also locational factors which
10 I'm not going to -- unless you want me to --

11 MR. MARREN: No.

12 MR. SMITH: -- try to repeat in this
13 call. But that can also differentiate generators
14 within the SHEI area. To be literal, in most
15 conditions a megawatt curtailed at Sheffield or
16 Kingdom Community Wind has a bit more relief effect,
17 if you will, on the interface than a megawatt
18 curtailed at some other generator. That's an
19 example.

20 MR. MARREN: Thanks. All right. I
21 think Patty Richards wanted to speak. Maybe by
22 phone, since I don't necessarily see her on the
23 video. Patty, can you hear us?

24 (No response)

25 MR. MARREN: All right. Maybe I'll

1 come back to that. She sent me a message saying she
2 had a comment, but sounds like she is having
3 technical issues right now.

4 All right. I'm just going to share a
5 slide that we had prepared that just listed some of
6 the sort of implementation issues that staff had
7 thought of. Many of them have already been raised,
8 but I wanted to let people respond specifically to
9 any of these if they had thoughts.

10 Out of the bullets one that jumped out
11 at me in the conversation already is people mentioned
12 the sort of notion of putting a formula or something
13 like that into the rule as opposed to the \$75 number.
14 So do we need to do more work to put that formula in
15 writing? Or is that something that the stakeholders
16 already have on paper somewhere and it just needs to
17 be shared with us?

18 MS. CHENEY: May I briefly interject?
19 This is Margaret Cheney. That another way to do it,
20 and I think someone may have alluded to it would be
21 to include it in the biennial adjustor portion of the
22 rule so that there would be an automatic
23 reexamination on a regular basis.

24 MR. MARREN: Right. So yeah. So any
25 of those -- now's the time I think, you know, what do

1 people think about what's the best mechanism for one
2 authorizing a fee? And then two, adjusting it
3 periodically.

4 And I'll take down the slide so that
5 people can see each other.

6 MR. SMITH: Doug Smith here. GMP. I
7 would just offer that a whatever, practitioner who
8 tried to support the department in its efforts, my
9 sense is that the process might logically include
10 something along the lines of what the -- of what
11 unfolded in the prior uncontested proceeding where
12 the -- where a proposal is made including -- that
13 lays out the concept and the major, you know,
14 assumptions and methods that underlie it.

15 My sense is parties -- might warrant
16 parties having a chance to comment about that and ask
17 questions. Just putting it a different way, it would
18 seem difficult to me, I'm sorry to say, but it would
19 seem difficult to skip that step. It's too unique,
20 too arcane, and parties may not be satisfied with --
21 I don't think -- with the result without a chance for
22 that type of interchange.

23 MR. McNAMARA: Agree with that. There
24 does need to be transparency associated with it.
25 There does need to be an explanation of how the

1 methodology works.

2 I will say having worked with Mr. Smith
3 and Mr. Kieny and their calculations of this, it's
4 not the most enjoyable task going through the
5 methodology, but it's also important that that be
6 transparent and public as well as the assumptions
7 that would go into it. Because this is essentially,
8 you know, it's essentially a model, and you need to
9 feed it, you know.

10 Recognizing that they need to be
11 regularly updated, people need to be able to actually
12 take a look and kick the tires on that. I think
13 that's absolutely critical in doing that. With
14 process --

15 (Technical difficulty)

16 MR. McNAMARA: I'm sorry? With respect
17 to the overall process --

18 MR. SCHILLING: We can't hear you.
19 Maybe you need to call in.

20 MR. MARREN: All right. Maybe -- it
21 looks like Ed is taking a pause for a second while he
22 gets his situation worked out.

23 Did Ms. Richards from WEC get back
24 online and does she want to offer her comment while
25 Ed gets straightened out?

1 MS. RICHARDS: Happy to, Jake. Can you
2 hear me?

3 MR. MARREN: Yes. Speak up, please.

4 MS. RICHARDS: Okay. Thank you very
5 much. I'm having some technical difficulties here in
6 East Montpelier. I think all of us are at this
7 point.

8 The only comments that I wanted to
9 make, just broad general concept comments, is that
10 WEC supports -- Washington Electric Co-op has 85
11 percent of its power supply both at Sheffield and the
12 Coventry landfill gas plant. 85 percent of its
13 generation is within the SHEI. We have no load in
14 the SHEI, and the comments and question about net
15 benefits, we are significantly harmed by the impacts
16 of more generation being located inside the SHEI.

17 We have spent millions of dollars on
18 the Coventry plant, and we have significant long-term
19 investment in the Sheffield wind project via PPA.

20 Our concern is it feels like the
21 existing projects have been left to the wayside to
22 fend for themselves. The ratepayers of Washington
23 Electric Co-op, the members of Washington Electric
24 Co-op, bear the brunt of added generation coming into
25 the SHEI in the sense of less value, less payments,

1 less energy revenue coming in from the Coventry plant
2 and the Sheffield project. That is translated to
3 real rate pressure on to our consumers.

4 And I support the department's proposal
5 of sending a price signal that this area is not the
6 best area for developers to develop. There are other
7 parts of the region of the state that we certainly
8 could deploy renewables, and we want to see more
9 renewables coming into the state, just not areas that
10 harm existing renewables.

11 So we are very much encouraged by
12 having a price signal mechanism. It may not be
13 perfect, but I think that the general scheme of
14 having a price signal to tell developers that this is
15 not the greatest place to develop is a good thing.
16 And there are other parts of the state that don't
17 have transmission constraints, and really encouraging
18 them to move to other parts of our state that have
19 transmission capacity makes sense. It's good for the
20 ratepayers.

21 WEC does not want to see more increased
22 rate pressure due to added generation in the SHEI.
23 That's all it's going to do is just continue to pile
24 on rate pressure for WEC members. So I just want to
25 put that general point out there that we are in

1 support of a price signal mechanism that basically
2 encourages developers to develop in places that make
3 sense.

4 Having new development in this region
5 just hurts existing renewables. And that's not in
6 the public good, and that's not good for the state
7 and WEC membership.

8 Thank you.

9 MR. SCHILLING: Ms. Richards, could you
10 clarify by price signal mechanism are you referring
11 to the department's current proposal or something
12 else?

13 MS. RICHARDS: Yes. I am referring to
14 the department's proposal. WEC is in support of the
15 price signal as the department has put out.

16 MR. SCHILLING: Okay. Thank you.

17 MR. MARREN: All right. Ed sent me a
18 text. I think he's going to be a few minutes while
19 he gets his computer system worked out.

20 So if anyone else wants to, you know,
21 address what we have been discussing here, these
22 topics, feel free to jump in now.

23 CHAIRMAN ROISMAN: I have a question
24 for Ms. Richards.

25 Ms. Richards, what I hear you saying is

1 that from WEC's perspective the best outcome is that
2 no new renewables be built in the SHEI area. And if
3 that's true, why do you think this particular dollar
4 number is the price signal that will stop that from
5 occurring? What we are seeing is, we certainly heard
6 it from Mr. Carpenter, is the developers are more
7 than happy to pay it and still go ahead and build,
8 which doesn't seem to be accomplishing what you would
9 like. The price signal that I think you're asking
10 for is one that would essentially stop the
11 development in the SHEI.

12 Am I misunderstanding what you're
13 seeking from WEC's perspective?

14 MS. RICHARDS: I believe from our
15 perspective the concept of the cost causer would pay
16 would be implemented here. What I mean by that is in
17 the structure of building generating plants across
18 New England, the last developer that comes to the
19 table that basically -- that causes a congestion
20 issue on a transmission line would have to pay for
21 that transmission upgrade.

22 In the ideal world, the small
23 development that we are seeing here in the State of
24 Vermont would follow that cost causer principle in
25 correcting the situation if they want to come online.

1 I recognize -- WEC recognizes that the small
2 development can't afford to do that. So we certainly
3 understand that it is causing rate pressure for
4 Washington Electric Co-op.

5 We would settle for the imperfect
6 solution to this, and -- in support of the
7 department's proposal of a per KW fee. We think
8 that's an imperfect solution, but I would rather at
9 least have that than nothing at all. Because it does
10 start to tell developers that there is an issue up
11 here, and perhaps they would start looking in other
12 places.

13 So I'm not going to die on the sword
14 for the perfect solution in that no development
15 occurs in the SHEI region. But I think a price
16 signal makes sense, and it's a place for us to start.
17 And if we have a per KW fee, then we can work on that
18 over time, and as new development comes in, can
19 potentially increase it or make adjustments to it as
20 needed.

21 So we -- WEC is willing to settle for
22 an imperfect solution to this in the sense that it
23 sends a price signal, and it's an attempt to move in
24 the right direction as we move forward with
25 development in the region.

1 At the end of the day I just want to
2 put a voice out there that we can't forget about the
3 ratepayers. Electric rates have gone up because of
4 this, and I'm vastly concerned about that. I just
5 really want to make sure that that's on the record.

6 MR. SCHILLING: Ms. Richards, to
7 clarify, do you feel that the department's proposal
8 would address the economic harm that ratepayers are
9 seeing right now in WEC's territory?

10 MS. RICHARDS: I think it helps. I
11 don't think it perfectly solves for that, but it
12 helps. And as I said, we are willing to accept an
13 imperfect solution to this so that we can at least
14 start making progress instead of having no price tag
15 associated with it at all.

16 CHAIRMAN ROISMAN: Ms. Richards, just
17 one last question for you.

18 Would you propose, would WEC propose, a
19 higher per kilowatt fee? Remember this is just a
20 proposal from the department. Ultimately the
21 commission, if we are going to set a number here,
22 could set a higher number or a lower number as well
23 as no number.

24 Would WEC recommend that we have a
25 higher number?

1 MS. RICHARDS: At this point we have
2 not secured consulting time to defend the higher
3 number, and I'm willing to live with the department's
4 proposal at this time. Our thinking is the concept
5 of getting a per KW fee in place is the first step,
6 and then once that's in step -- in the event WEC
7 would like to spend gobs and gobs of money on a
8 consultant to defend a higher rate or a higher per KW
9 fee, then we could at least do that.

10 Right now we at least need to get the
11 mechanism in place to charge a fee, and then I think
12 after that point WEC could eventually come in, if it
13 so desired, to defend the higher fee or propose a
14 higher fee. But at this point we would like to see
15 at least the concept of the mechanism of a per KW --
16 dollar per KW fee in place implemented. So that's
17 the first hurdle we would like to clear.

18 MR. SCHILLING: I see Mr. McNamara is
19 back with us. Are you able to talk now?

20 MR. McNAMARA: Can you actually hear
21 me? Is the clarity okay?

22 MR. SCHILLING: Yes.

23 MR. McNAMARA: Okay. Great. Thanks.
24 Coherent is a different matter.

25 So I believe I was talking about

1 methodology in terms of the department would be
2 amenable to -- given the methodology spelled out in
3 the rule, or simply something that's one line saying
4 utilities may adopt a grid adjustor after appropriate
5 opportunity for review and, you know, by interested
6 stakeholders through a tariff mechanism. That's an
7 alternative way of doing it.

8 Given the significant pace of
9 transition that we are seeing in the electric sector,
10 I have been leaning much more heavily towards let's
11 do things more in a tariff setting that can be
12 updated provided there is opportunity for
13 stakeholders to weigh in. Appropriate opportunity --
14 well not just appropriate, but always having the
15 opportunity to go to the PUC to contest what is put
16 in a tariff, what's put forward.

17 The department does have some concerns
18 generally with putting things into a rule that are
19 then hard to unwind or modify later on. So it's not
20 a firm, you know, decision. Just telling you where
21 that preference for a tariff comes from.

22 MR. MARREN: Thanks, Ed. That's
23 helpful. So expanding on that idea a little bit
24 more. Would the department think that the
25 authorization, let's call it that, say we had a rule

1 that authorizes the utilities to file proposed
2 tariffs, should those tariffs only be allowed for
3 utilities that are located in the SHEI area? Or
4 should we be a little bit broader? Should we say any
5 export-constrained area? Or are there other kinds of
6 constraints that could be amenable to a similar type
7 of solution that we could authorize utilities to
8 address?

9 MR. McNAMARA: Yup. So I think the
10 language of export-constrained area helps cover
11 pretty much any current SHEI boundaries and potential
12 future expansion of boundaries. Recognizing that,
13 for example, Green Mountain Power would have to
14 explain, yes, SHEI has now gotten to our service
15 territory, and therefore we are filing a tariff.

16 With respect to other types of
17 constraints, the most recent VELCO long-range
18 transmission plan did identify in certain areas,
19 depending on continued growth of distributed
20 generation, there are potential upstream or
21 transmission impacts. So in other words, you might
22 be able to site something from a distribution
23 perspective, and it would have impacts on the
24 transmission system.

25 That's something that the department or

1 I should say -- I have been going back and forth.
2 I've thought maybe it's something where you provide a
3 price signal and net-metering compensation. And I
4 mentioned this before, earlier today, depending on
5 what the commission decides in the interconnection
6 rulemaking, if the commission decides that cluster
7 studies can be appropriate for these type of areas,
8 then that may be sufficient and a better way to
9 address these potential upstream impacts.

10 The department would be concerned with
11 having a compensation adjustor in one area, you know,
12 or a compensation adjustor to address these upstream
13 impacts through the net-metering compensation rule,
14 and then also having in the interconnection rule a
15 requirement that all net-metering customers, and this
16 is a hypothetical, all net-metering customers would
17 have to pay into a cluster study to interconnect,
18 recognizing the upstream impacts there. That would
19 be essentially a double penalty for lack of a better
20 word.

21 And so I think it's worthwhile
22 understanding -- it's sort of unfortunate because
23 they are two separate rules. I think it makes sense
24 to keep those in two separate rules. But it may make
25 sense to continue talking about both aspects or that

1 aspect in both rules and understand what is the more
2 appropriate mechanism to recognize those upstream
3 transmission impacts, whether it's through net
4 metering compensation, or whether it's through
5 cluster study requirements, or some other mechanism
6 that somebody else proposes.

7 MR. MARREN: And just to clarify, when
8 you say pay into a cluster study, the costs you're
9 referring to there are the costs of the transmission
10 fix or upgrade. Not the cost of the study itself.

11 MR. McNAMARA: It could actually -- it
12 would be both to a large degree. The study itself
13 can be fairly expensive, depending on whether it
14 triggers a need for an ISO study or a study that
15 meets ISO New England's requirements, or whether it's
16 something that VELCO can do on its own without
17 necessarily jumping through all the ISO New England
18 hoops.

19 And I will say I'm just getting --
20 starting to get over my skis in terms of how this
21 would work. And I guess I would just recommend
22 thinking about there is two different mechanisms to
23 address the potential costs associated with -- the
24 potential economic costs associated with needing to
25 build transmission to accommodate distributed

1 generation in some areas.

2 The department's not entirely sure what
3 the best mechanism is at this point.

4 MR. MARREN: Okay. Would anyone else
5 have any thoughts about sort of best -- or ideas
6 about how to best implement a mitigation fee if the
7 commission did that?

8 MR. SMITH: Doug Smith here. GMP.
9 Just briefly, reflecting a little and adding to one
10 of my comments before. I do think that process wise
11 if the commission goes down this road, it will be
12 helpful to have -- whether it's the department or
13 another sponsor of a locational adjustor, lay that
14 out pretty early in the process to sort of --
15 supporting my earlier comment to give stakeholders a
16 chance to just look at it and ask questions.

17 Secondly --

18 MR. MARREN: One second, Mr. Smith. I
19 just want to follow up. How would that process be
20 different from what we did in case 3304? There was a
21 memo that was put out where GMP and VEC sort of laid
22 out how they arrived at \$75 a kilowatt. And, you
23 know, there was an opportunity for folks to look at
24 that and to contest the number, and I know some
25 utilities at least wanted a different number at one

1 point. So, you know, I definitely -- I'm all for
2 process. Process is what the commission makes, so we
3 can do more process, but is it something different
4 than what we did in that other case?

5 MR. SMITH: Ah. Thank you. short
6 story, I think my response comes down to do at least
7 that. In other words, at least have that
8 opportunity. I was reflecting on some of the -- like
9 in the biennial process if that's where it goes.
10 Make sure you leave enough time for that, for, like,
11 a round of feedback, because it may be new material
12 and arcane, I think is what I'm trying to say. Leave
13 room for it. If -- from a scheduling sort of
14 perspective.

15 MR. MARREN: Maybe we are talking past
16 each other. Are you referring to sort of updates to
17 the fee amount going forward? Or are we talking
18 about sort of in the first instance the commission's
19 going to do a rulemaking say, and issue a draft rule
20 that says that utilities may have fees. They are
21 going to look like X, Y and Z, and then we would have
22 the rulemaking process?

23 So what I'm trying to figure out is
24 should we be doing something before we get to the
25 rulemaking process to explain how this fee was

1 developed, or are you talking about after we get a
2 rule in place it's going to have a process that it
3 spells out for every 10 megawatts or every two years
4 we look at the fee again.

5 MR. SMITH: More the latter. Yeah. My
6 mistake. Mine was a little bit of a non sequitur.
7 Yeah. The latter. Practical implementation on a
8 case-specific basis would warrant that.

9 And my only other comment was just Ed
10 McNamara talked a little bit in the last few minutes
11 about upstream or subtransmission or bulk
12 transmission impacts that can arise as distributed
13 generation continues to grow.

14 I guess my comment was just going to be
15 it is complicated, that interaction he described,
16 between the interconnection rulemaking and the net
17 metering. But our sense is it's worth it. Take your
18 time and think about it.

19 The long-range transmission plan does
20 lay out some instances where it could be millions or
21 tens of millions of dollars of transmission upgrades
22 that would be largely or entirely Vermont paid. That
23 potentially could be deferred or avoided if we are
24 more thoughtful. I'm not going to repeat VELCO's
25 language, but they do in their long-range

1 transmission plan raise that prospect. It seems big
2 enough at least for the larger ones, the ones that
3 are tens of millions of dollars, there are a couple
4 that might even be 50 or a hundred. That it's worth
5 thinking this through, because why do I say that?

6 At least today, under today's program
7 design, net metering, although they are small
8 individual projects, is actually the clear majority
9 of new distributed renewables. For GMP it's running
10 something like 2/3 of our distributed solar, so the
11 accumulated effects can matter. Thank you.

12 MS. KROLEWSKI: Can I ask a question
13 here? With regard to these export-constrained zones
14 might the methodology for adjustors differ? For
15 example, one export-constrained area might not have a
16 DNE component. And so would the adjustor look
17 different? And so would each adjustor sort of have
18 to lay out a new -- each export-constrained zone
19 would you have to lay out a new methodology for
20 developing an adjustor?

21 MR. SMITH: My answer would be -- I'm
22 curious what others think. Possibly. Clearly in an
23 instance like we were just discussing in the last 5
24 minutes where we are talking about an instance that
25 is not an ISO-defined existing export constraint

1 interface today, but rather the prospect of a cap --
2 of a grid upgrade that is in the headlights, if you
3 will, and might be avoided by a different development
4 pattern of our renewable generation. At least for
5 those two examples, it feels different.

6 As to the details, I don't know. My
7 head's too much in the SHEI one, and I'll stop there.
8 I have to think about it some more.

9 MR. McNAMARA: And so the other -- I do
10 think for export constrained, I think it would be
11 useful to get some terminology. When I think of
12 export constrained I think of SHEI and some
13 expansion. So there would always be some ISO New
14 England market rules implicated, so do not exceed
15 would be implicated.

16 And there is the clear methodology that
17 was put forward to be able to calculate for an
18 export-constrained area.

19 In these other areas, and I need to
20 come up with something better, hopefully somebody
21 else will, the sort of areas where there is upstream
22 transmission impacts where transmission needs to be
23 upgraded. It's not like in SHEI where you can just
24 turn down generation from existing resources. But in
25 other areas, you need to upgrade transmission in

1 order to accommodate these new distributed
2 generation.

3 That would definitely require a
4 different methodology, and likely it would be based
5 more on what's the cost to upgrade the transmission,
6 how would that be allocated to all of the new
7 interconnecting generation. So that's partly why I'm
8 thinking that might be more appropriate for the
9 interconnection rulemaking rather than the net
10 metering -- or in the net-metering compensation
11 context.

12 I'm not a hundred percent sure of that,
13 but at least at the moment this is relatively new as
14 of this morning, I'm starting to think that actually
15 might be more appropriate for interconnection
16 rulemaking. There is definitely simplicity and
17 benefit to having just in the net-metering rule
18 saying here's the price signals telling you where the
19 best places in the state are to build rather than a
20 developer having to say, okay, well the net-metering
21 rule I have to look at, you know, is it an export
22 constrained versus an upstream-impact constrained
23 area.

24 So there is lots of different
25 trade-offs. Still, as I said, I'm not sure of the

1 best way to go. It's relatively complicated,
2 especially this latter. The fact that SHEI is now
3 looking -- the SHEI adjustor looks more simple than
4 the others is making me kind of nervous about how to
5 address the other ones, the other areas.

6 MR. MARREN: All right. It's 11:00
7 now. So, you know, we had advertised this workshop's
8 going until 12:30. We have been going for an hour
9 and-a-half. I'm going to propose we take a 5-minute
10 break for people to stretch out, get a drink of
11 water.

12 Maybe we'll come back at 11:10. And
13 then we can talk about some of the more broad changes
14 to the net-metering rule that might be implicated by
15 the SHEI. And then next steps. And then we could
16 get this wrapped up before lunch. Is that okay with
17 everyone? See everyone at 11:10.

18 (Recess was taken.)

19 MR. MARREN: All right everyone.
20 Welcome back. So the last sort of group of topics
21 that we wanted to have an opportunity to discuss
22 today was, you know, the commission recognizes that
23 other changes to the net-metering rule might be
24 necessary beyond the department's proposal. So you
25 know, I wanted to just remind everyone that there

1 will be a workshop devoted entirely to net-metering
2 compensation, which I think that would be a great
3 place to discuss some of the locational, you know,
4 issues that -- and some of the other folks have
5 brought up.

6 But there are some more discrete topics
7 that we could address in the net-metering rule that
8 are SHEI related. I know that in the previous case,
9 one of the utilities, I can't remember if it was VEC
10 or WEC, sorry if I'm misremembering, you know,
11 proposed that our definition of preferred sites
12 should explicitly exclude constrained areas.

13 You know, other topics that came up
14 were potentially limiting the installation of certain
15 sizes of projects or kinds of projects in the SHEI.
16 Or also, you know, requiring projects to be
17 collocated with controllable load so that we could
18 try to avoid curtailments events.

19 I know some of these topics have come
20 up already. But if anyone wants to comment on the
21 issues or anything else that maybe we have
22 overlooked, are there other changes to the net-
23 metering rule that we could make that would help
24 alleviate SHEI issues? Anyone can jump in at this
25 point.

1 MR. McNAMARA: So Ed McNamara at the
2 department. I would say that there is a balance.
3 There is lots of ways to alleviate -- lots of ways to
4 alleviate SHEI, or sorry, to minimize the future
5 impact on SHEI. And it's also a recognition as well,
6 that customers in one area of the state not being --
7 not being effectively allowed to participate in net
8 metering, in programs that are allowed in other areas
9 of the state.

10 And so from the department's view,
11 sending price signals as to the relative value of
12 distributed generation is appropriate. Blanket
13 prohibitions the department has more concerns with
14 and has not proposed and is not proposing that.

15 With respect to definition of preferred
16 site, the department looks forward to submitting
17 comments, written comments. We do want to talk
18 internally a little bit with our counterparts at
19 Agency of Natural Resources. I will say the
20 preferred sites is really meant to be more of a land
21 use incentives to appropriately optimize sites
22 identified during the Act 174 regional planning
23 commission, municipal planning commission processes.
24 And at least preliminarily, we think that there is
25 still value in the preferred site adder.

1 We want to think that through a little
2 bit more. But recognize that having a first step of
3 recognizing locational value of distributed
4 generation is really important. Recognizing the
5 other societal benefits of well-sited project, you
6 know, which is accomplished through the preferred
7 site designation, an adder, we believe is still
8 appropriate.

9 We do want to have some internal
10 discussions on that. We are still thinking it
11 through. But the department thinks there really are
12 two separate issues. The grid and overall societal
13 objectives.

14 MR. CARPENTER: This is Dave Carpenter.
15 If I could throw a thought out there. I see nodding.

16 So again, just speaking from a
17 developer's perspective, and again, only for my
18 company obviously Green Lantern Solar. You know, the
19 reduction in -- let me turn my camera on here so you
20 can see my lovely mug.

21 The reduction in incentives for net
22 metering at the C&I scale I think has, excuse me,
23 disincentivized, you know, a lot of development at
24 that scale.

25 The preferred site question, that's

1 obviously one that will have to come up. You know,
2 there were -- and again, maybe this is inappropriate
3 at this particular stage of discussion, you know, but
4 the problem I think VEC has, and I certainly don't
5 want to speak for VEC, but this is just in working
6 with them for a number of years, is that most of
7 their territory is in the SHEI. That's the biggest
8 problem that VEC customers have.

9 Community solar has a hard time picking
10 up steam because it's really hard to administer from
11 the -- from, you know, a billing and customer
12 management perspective. In other states there are a
13 lot of large aggregators that will collect all of
14 your customers for you and manage them. We just
15 don't have that in Vermont really. There is
16 Competitive Energy Services and Also Energy and some
17 other companies that do that in other states but not
18 in Vermont.

19 For residential customers, you know,
20 you know, who have their facilities at the load,
21 that's one thing. For business customers, and, you
22 know, schools and municipalities and so on and so
23 forth, at the C&I scale, 150s and above really, it
24 can be much more difficult. Because the -- it's
25 harder to collocate because they may not have the

1 ability to locate that generation near where the load
2 is just because of site control and so on and so
3 forth. So it's a little bit of a different animal.

4 But I think that, you know, so locating
5 a net-metering project in VEC's territory that is
6 also not in the SHEI is challenging. And I think
7 that that's part of the problem that you've got with
8 this, you know, with this giant overlap. Because if
9 you are excluding people from participating because
10 they are in the SHEI, you're excluding most of VEC's
11 customer base. That's at least, you know, my
12 perception. And Craig should feel free to jump in
13 and correct me if I am wrong on that.

14 So that's, I think, sort of a
15 particular challenge with this constrained area with
16 regard to the SHEI. The other thing too, and this is
17 sort of just a philosophical difference, I think, is
18 the Lowell and B20/B22 upgrades, when they are
19 complete as well as the Sheldon maybe are and a
20 couple other projects that GMP is working on. There
21 is all, you know, testimony and so on and so forth in
22 the record in that docket about how much it's going
23 to reduce the number of hours of constraint, you
24 know, down to I think -- correct me if I am wrong --
25 down to a hundred hours a year or something like

1 that. I don't remember exactly what it was.

2 So there is a sort of a philosophical
3 question about what happens to that head space. You
4 know, who is that available for? And I know that the
5 department and the utilities had made some arguments
6 about that not being available community. You can't
7 say that's head space that developers on the private
8 side can take advantage of because you're just going
9 to create a bigger problem that is then going to have
10 to be corrected later.

11 So I think it's, you know, again,
12 getting back to the idea of an easily administered --
13 don't let the perfect be the enemy of the good to
14 sort of offset what those harms are, does send price
15 signals and does at least attempt to make the
16 utilities and ratepayers whole in that regard. I
17 don't know if that's helpful.

18 MR. KIENY: This is Craig Kieny, VEC.
19 I missed the original question that started the
20 discussion. But I will add that SHEI covers roughly
21 80 percent of the geographic territory that VEC
22 covers. Probably as far as the customers go, it's --
23 or load it's maybe at 70 percent. I don't know the
24 exact number.

25 So Dave was mentioning about excluding

1 customers if no net metering of SHEI. Certainly a
2 lot of rooftops that are in the SHEI that would be
3 eliminated. We do have a community solar program
4 that has -- we use with the 5 megawatt project in
5 Grand Isle and the two 1 megawatt projects in Alburgh
6 at McGee Hill.

7 But I just wanted to shed a little
8 light on some of the things David raised, and I don't
9 know what the original question was. So if you want
10 to restate that I'll -- I would try to answer
11 anything that's appropriate there.

12 MR. MARREN: Sure, Craig. We were just
13 discussing are there any other changes to the net-
14 metering rule besides an adjustor or a mitigation
15 fee, that people would recommend to address SHEI
16 issues. And some of the examples that we had tossed
17 out there were, you know, either changing definitions
18 of preferred sites or limiting the amount of capacity
19 that is installed within a constrained area. Or
20 requiring, you know, new capacity to be collocated
21 with batteries or some other kind of load.

22 You know, those were just sort of ideas
23 that we were interested to hear if people had other
24 ideas about possible improvements to the rule to help
25 alleviate SHEI constraints.

1 MR. KIENY: Not at this time. Maybe as
2 the proceeding moves forward. Not right now.

3 MR. SMITH: Doug Smith, GMP. Just I
4 think it's a little tough because we are learning
5 this together and working vocabulary. But I think
6 that if -- in order to implement this potential
7 approach, if we can get rule language that
8 contemplates and gives the commission the ability to
9 identify certain areas that warrant an adjustor, and
10 to take evidence on why that is and how -- what the
11 magnitude is, that rubric, that may be enough. In
12 other words, a set of rule language that contemplates
13 starting with just an existing or identified
14 congested area like SHEI enables -- that enables the
15 PUC to set an amount of an adjustor.

16 I've suggested the biennial might be a
17 place to do that. And also to revisit over time.
18 And if that is accomplished, and if the rule language
19 can also -- I'll say contemplate -- the other types
20 of situations that Mr. McNamara or others brought up
21 where it's not a defined interface today, but there
22 is a grid upgrade in the headlights, if it can do
23 those things, and that seems like enough.

24 And so I don't want to jump ahead to
25 process, but I'll just, flash, you can probably tell

1 based on those comments, that we think it makes sense
2 at some point soon to try to rough out that language,
3 for the commission to take, you know, just comments
4 on what that would look like, and that might help
5 make it be a little more tangible and see if there is
6 something missing.

7 MR. MARREN: Great. Doug, I think you
8 predicted my next slide. If folks are ready to move
9 off from this topic and get to process and sort of
10 next steps, I'm happy to go there. But if anyone
11 wants to bring up any other, you know, potential
12 changes to the net-metering rule, now's the time to
13 do it. You can always do it in writing later, which
14 is what we are going to talk about next.

15 MR. SCHILLING: I just wanted to
16 interject, did the commissioners have any questions
17 about any of these tools before we move on to
18 process?

19 MS. CHENEY: No. Thank you.

20 MR. McNAMARA: This is Ed. If I can
21 just expand a little bit on what Mr. Smith just said.
22 The method -- I would say especially Mr. Smith and
23 Mr. Kieny did a significant amount of work on the
24 methodology, the calculation for the adjustor. The
25 department would be concerned about trying to

1 replicate that for sort of non-export-constrained
2 areas, other constrained areas, the ones with
3 upstream transmission concerns.

4 And so I would just echo what I heard
5 Mr. Smith say which is getting some direction of --
6 if the PUC is comfortable with the general direction
7 of the ability to identify constrained areas and
8 potentially set a price without having a very clear
9 this shall be the price, the general principles
10 involved of should there be -- should the utilities
11 or the commission or somebody be able to propose
12 locational adjustors with sufficient overview and
13 everything else.

14 So I would suggest as we think about
15 the process, that it may be broken down a little bit
16 of some of these core issues to be determined first,
17 and then if the PUC determines that this is --
18 general direction is appropriate, then further work.
19 The department's a little bit concerned with putting
20 lots of resources in. I can see nodding, Mr. Marren.
21 So yup. Just wanted to make that pitch.

22 MR. MARREN: Yeah. I get that. I
23 think we will have to get, you know, the
24 commissioners together. And we will need to talk
25 about how they feel about a general direction and

1 then communicate that somehow.

2 I understand a lot of work has already
3 been put into coming up with the straw proposal. And
4 we appreciate that, and so we don't want to make
5 people come up with very complex solutions that might
6 not be adopted.

7 MR. SMITH: May I toss in one comment?
8 Doug Smith. Just to support this. Just maybe
9 briefly.

10 Yes. That was a challenging
11 quantification effort for the SHEI to go through sort
12 of the math of if more EG solar is added, well how
13 often will that make congestion? How deep is it? I
14 just want to volunteer the notion that it may not
15 have to be like that in each case. There may be
16 simpler methods that can be used.

17 It took us awhile frankly to bone up
18 and go deeper into the workings of the SHEI and a
19 congested interface, but we have learned some of
20 those lessons and can hopefully bring them along.
21 And in some other circumstances that type of
22 complexity just may not be needed to understand the
23 level of costs in the headlights using my term.
24 Thank you.

25 MR. MARREN: All right.

1 CHAIRMAN ROISMAN: I wanted to ask one
2 question about that. I seem to remember that during
3 -- maybe during the Derby proceeding one suggestion
4 that was floated was -- or maybe in a different
5 proceeding, was that the new renewable resource would
6 itself turn off during periods of constraint so that
7 the constraint would hit the new source rather than
8 an existing source.

9 And I didn't know, I know one thing I
10 heard was that there was this communication issue.
11 How would they know that it was time? And candidly,
12 I didn't understand that. I was under the impression
13 that the people at ISO had telephones and internet
14 connection and were equally capable of sending a
15 message to somebody else and not only to the
16 utilities that were running the Sheffield or Lowell.

17 But I wondered whether anybody has
18 thought about that as an option instead of a dollar
19 adjustor. And if so, what they think about it.

20 MR. McNAMARA: So this is Ed McNamara.
21 The department spent a fair amount of time right
22 after the Derby decision trying to come up with some
23 sort of curtailment scheme. There was concerns about
24 the interface between the ISO New England markets and
25 effectively state retail -- regulatory decisions

1 impacting retail level resources as well. That was
2 one concern.

3 The other was the necessary
4 infrastructure to actually communicate, if for
5 example, VEC was tasked with curtailing resources in
6 response to a signal from ISO New England, there
7 would need to be significant infrastructure build out
8 by all of the net-metering facilities in the area;
9 potential audits, potential true-ups, lots of
10 different things that will run into it.

11 And in the end, it was decided that a
12 fee would actually be significantly less expensive
13 and less time consuming for all involved given the
14 state of technology as it is right now. It's
15 possible that going forward better communication
16 systems can be developed, better processes can be
17 developed. But at the moment, it was thought that
18 the mitigation adjustor was the simplest, most
19 straightforward and economic process for all
20 involved.

21 I'll let other folks chime in as well.

22 MS. KROLEWSKI: I have a question here.
23 Isn't also the complexity due to the fact that you
24 have to sort of guess when that DNE is going to be
25 hit? And it gets set, and then you can sort of

1 curtail resources after the fact. But you've sort of
2 set the DNE because you didn't curtail them before it
3 was set.

4 So isn't that somewhat of a problem as
5 well?

6 MR. McNAMARA: I'm going to let Doug or
7 Craig answer that. Because that's level of technical
8 knowledge that they have.

9 MR. KIENY: Yeah. It's Craig Kieny,
10 VEC. Yeah. That is -- the time delay is an issue.
11 Communication delay for sure. Especially on the
12 short first burst of congestion when it's only 5 or
13 10 minutes. If it's going on for 8 hours, 5 or 10
14 minutes doesn't matter much. But when it's going
15 back and forth, we could miss some congestion events,
16 or we could be curtailing when they weren't
17 occurring.

18 MR. NOLAN: Can I -- Ken Nolan, Vermont
19 Public Power. Directly to Chair Roisman's question
20 about the ISO, I think one of the challenges we run
21 into is the ISO rules and how they interact with
22 generators. They are very protective of bids and
23 generator communication. And we find it even within
24 our member systems that ISO only communicates
25 directly with the lead participant of the generator.

1 So even if there are five or six offtakers of that
2 generator, only the person that's operating the plant
3 will get communication.

4 And we see that with McNeil, for
5 example. Burlington gets communication. The rest of
6 us do not. And that's exacerbated for any generators
7 that are not directly participating in the ISO
8 market. The ISO doesn't feel the need to talk to
9 those resources at all. And there is really no
10 protocol for that to happen.

11 So the capability is there. But it's
12 really tied up in the rules and procedures of the way
13 the ISO works.

14 CHAIRMAN ROISMAN: Thank you. That's
15 very helpful.

16 MR. SMITH: Doug Smith, GMP. All I
17 would add again to this line of conversation is first
18 I've got to think about that a little more, the
19 proposition that Chair Roisman raised. But I guess I
20 would note that in my mind, when we see -- when we
21 have an existing export constraint or an
22 infrastructure upgrade in the headlights, my sense is
23 that these -- the ability to curtail renewable
24 generator, it feels to me like a tool that's
25 available. And we are going -- it's not either or.

1 We are going to keep looking at that.

2 But by my sense going in is that it
3 doesn't obviate the value of having a price signal.
4 I think I need to recheck my reasoning after this,
5 but that's my current thought. Is that they're
6 complementary. They are not one or the other.

7 MR. CARPENTER: This is Dave Carpenter
8 of Green Lantern Solar. To add on what all the other
9 folks have said so far.

10 The only other thing that I would add
11 is just -- we don't just develop projects. We own
12 them long term as well. So the issue then becomes a
13 level of certainty. You know, in terms of how do we
14 forecast that. I know that, you know, that's not
15 everybody's biggest problem. It's worrying how the
16 owners would forecast the losses and so on and so
17 forth. But that gets awfully complicated from an
18 owner standpoint; when things get shut off, for how
19 long. You know, and obviously, you know, that may
20 increase over time. And how do we forecast that.

21 So you know all the things that Craig
22 and Doug and Ed were just describing all continue to
23 flow through to the project owners and then to the
24 customers at the end, at least from a net-metering
25 perspective.

1 MR. McNAMARA: This is Ed. If I can
2 just build off of what Doug said very briefly. I
3 would agree that curtailment is potentially an
4 option. We are going to continue looking at it. And
5 I would say all of the issues that were just
6 discussed regarding curtailment, storage is another
7 option that we are continuing to look at as well in
8 terms of those capabilities.

9 Much more likely for larger scale
10 projects, but essentially the ability to instead of
11 putting power on to the grid, put it into the
12 battery, could effectively be a mitigation strategy
13 as well.

14 And just to be clear, the department's
15 proposal -- the straw proposal was all net metering
16 systems and anybody larger than 500 KW should be able
17 to either look to that mitigation fee with some
18 adjustments, or also look at other mitigation
19 strategies.

20 If somebody wants to propose, if they
21 think they can build a better mousetrap and come up
22 with curtailment scheme that will work for them or
23 storage, they should absolutely be allowed to do that
24 if they can demonstrate it will work sufficiently.

25 MR. MARREN: Okay. Well then maybe

1 now's a good time to -- if anyone has any sort of
2 more substantive comments about this topic, now would
3 be the time to offer it. Otherwise, I would say we
4 should move on to talking about next procedural
5 steps.

6 (No response.)

7 MR. MARREN: I think that staff was
8 envisioning at a minimum a round of written comments
9 on this topic. You know, probably within about 30
10 days or so. Be interested to hear if folks would
11 like an opportunity to respond to written comments.
12 And then also just at this point I want to make a
13 pitch, I think it's been mentioned before, sounds
14 like there are some ideas about what we could write
15 in a rule here about language -- simple language it
16 sounds like that just authorizes utilities to propose
17 these kinds of fees subject to a regulatory review
18 and stakeholder process.

19 So I would encourage people to take a
20 stab at that. I mean we will certainly be thinking
21 about it here too after you submit written comments,
22 but more authors is better than a few, I think. It
23 really gives us an opportunity to think of different
24 ways of saying it, and then testing them and coming
25 up with better product in the end.

1 So I guess I'll toss out my proposal at
2 this point would be written comments about 30 days
3 from now. And then if people want an opportunity to
4 respond, they could do so within like another two
5 weeks. Does anybody want to do this sooner or later
6 or anything like that?

7 MR. McNAMARA: That time line is doable
8 from the department's perspective.

9 MR. KIENY: VEC as well.

10 MR. MARREN: Okay. Then I'll try to
11 put an exact date on this. How about, you know, one
12 month from today is Friday, August 27th. Do we want
13 to put that down as a deadline for written comments?
14 And then people can file a response by September
15 10th. Two weeks later.

16 And again, just to remind people this
17 is the first in a series of workshops. We are going
18 to have another workshop in August to talk CPG
19 process. And then another workshop that I'm sure
20 will be -- there will be a lot of interest in on
21 September 16th to talk about net-metering
22 compensation where some of these topics might also
23 come up.

24 So just keep those on your calendar.
25 And is there anything else that folks would like to

1 talk about today?

2 MS. CHENEY: Jake, I would just like to
3 remind ourselves, I believe the last workshop, the
4 final one you mentioned on compensation in September,
5 will be held in person.

6 MR. MARREN: Yes, it will. Thank you.
7 That's the plan for now. Keeping fingers crossed
8 that it's safe to do so and that everyone's
9 comfortable. But yes. The August workshop will be
10 in this format on GoToMeeting. And then September we
11 plan on being in person at our offices in Montpelier.

12 Mr. Carpenter, I see you've got your
13 finger up there.

14 MR. CARPENTER: Yes. Just a quick
15 question. Do we have an overall time frame for -- we
16 have got through September for workshops and then
17 what?

18 MR. MARREN: You know, it's open at
19 this point. I can't predict exactly what happens at
20 that point. The goal is to, you know, try to move
21 forward expeditiously on getting a proposal out
22 there. But there is a lot of information that I
23 think we need to collect about some of the other
24 topics in the workshops, and depending on what topics
25 are raised at those workshops, it may be a shorter or

1 longer period of time to get a proposal out there.

2 Mr. Wing?

3 MR. WING: Yeah, hi. Alex Wing on
4 behalf of the department. The department should be
5 able to do comments by August 27th. But when it
6 comes to the reply date, I will be away until shortly
7 beforehand, so I was wondering if we could move that
8 to the following week.

9 MR. MARREN: You know, I'm fine with
10 doing that just recognizing that also we will be
11 having that workshop that week, so there will be a
12 lot of net metering going on on the week of the 17th.
13 But, you know, if you want to take another week to
14 write a reply, it's really not a big deal.

15 MR. WING: Thank you.

16 MR. MARREN: That's fine. So we will
17 do that. Reply comments will be due on September
18 17th as opposed to the 10th. As I said earlier. So
19 --

20 CHAIRMAN ROISMAN: And Jake, one thing
21 -- as most of the people, if not everyone on this
22 call realizes, we issued two orders last week
23 involving SHEI facilities in which we are --

24 MR. MARREN: Mr. Chair, at this point I
25 just want to point out that those cases still are

1 ongoing proceedings and within the reargument period.
2 It might not -- it might be best to sort of leave the
3 discussions for specific cases for those --

4 CHAIRMAN ROISMAN: No, and I didn't
5 want to discuss them. I just wanted people to know
6 that we had issued orders, and I just wanted any
7 thoughts on whether the participants, while we go
8 through this process are -- want the commission to
9 continue to take SHEI applications case by case as
10 they come along, and look at what the parties to
11 those proceedings are offering, or whether they want
12 -- I mean these were all backlogged, older cases.
13 Whether the parties think we should hold on any new
14 SHEI's applications until we have resolved this
15 proceeding.

16 I don't want to talk about the merits
17 of what we are doing in those cases.

18 MR. CARPENTER: This is Dave Carpenter
19 from Green Lantern Solar. And I apologize here,
20 Chair Roisman. I'm not exactly sure what you're
21 asking about the pending cases.

22 CHAIRMAN ROISMAN: Well we have a
23 backlog of cases that have been filed around the same
24 time as Derby, and they were all put on hold until we
25 resolved Derby. We then resolved Derby.

1 And then parties came forward and asked
2 us to move on those cases. And in the cases that we
3 have looked at so far, they have come forward and
4 proposed this 86,000 which is basically the
5 department's proposal applied to the size of their
6 projects. And asked us to move on them.

7 And my question is do the parties want
8 us to continue to do that on a case-by-case basis
9 with parties coming in at least like those where
10 there was -- nobody was contesting anymore. VEC was
11 not contesting. GMP wasn't contesting. And
12 obviously the applicant was not contesting.

13 So my question is, do the parties think
14 that the commission should continue to do that on a
15 case-by-case basis, or do they think that we should
16 be waiting until we have come up with a resolution
17 that this rulemaking is intended to address?

18 MR. CARPENTER: I'm going to let the --

19 MR. MARREN: Yeah. I think that, Mr.
20 Chair, this isn't -- if the parties in those cases
21 that are pending want the commission to take a
22 certain procedural step or not take a certain
23 procedural step in those cases, they can make a
24 filing in those cases with copies to all the parties
25 in those cases. But all the parties to those cases

1 are not in this meeting right now, and I would prefer
2 -- I think it's a good idea to just, you know, not
3 talk about those cases.

4 Because, you know, they are separate
5 matters from this. And if the parties in those cases
6 want us to take a certain step, they can ask us to.

7 CHAIRMAN ROISMAN: And I'm not talking
8 about those. I'm talking about cases we don't have.
9 In other words, we have got this proceeding going on
10 to decide how to deal with the SHEI. We have got
11 five cases that are in the backlog, and we are going
12 to treat them using the process you just described.

13 What I want to know is are the parties
14 who are in this meeting, in this program, do they
15 want us to process applications in the SHEI as they
16 come along? Or do they want to have effectively us
17 not address them at all? In other words, are they
18 going to come to us with a bunch of proposals or not?
19 We need to be prepared if they are coming. And we
20 need to decide whether or not we are going to do
21 anything on brand new cases. Ones that haven't
22 happened yet.

23 That's all I'm trying to get a sense of
24 what these parties prefer us to do.

25 MR. CARPENTER: I guess I just want to

1 make sure when you say parties you're not talking
2 about the parties to the SHEI cases.

3 CHAIRMAN ROISMAN: No. I'm talking
4 about people who are on this call, who are interested
5 in this rule, are they essentially recommending that
6 we stay further action in the SHEI until such time as
7 we have completed this process and come up with some
8 kind of a generic solution? If we do?

9 MR. KIENY: This is Craig Kieny, VEC.
10 If I understand Chairman Roisman's question, I think
11 you're asking what -- if a project -- 500-KW project
12 was to apply in the SHEI today, what should we do.
13 Is that your question?

14 CHAIRMAN ROISMAN: Yeah. I mean what
15 does VEC want us to do? Do you want us to wait on
16 this process? Or do you want us to process it
17 without a de facto stay. Yes.

18 MR. KIENY: Well I'm not sure if this
19 answers your question, but if somebody applied today,
20 we would intervene. Because there is no agreement on
21 what to do. So we would intervene and treat it just
22 as we did the other state cases until something is
23 decided.

24 CHAIRMAN ROISMAN: Okay. All right.
25 That's exactly what I was trying to find out.

1 MS. RICHARDS: This is Patty jumping
2 in. WEC would like to see new projects suspended
3 until an adder or kilowatt fee is determined. So we
4 would like to see a stall of cases.

5 CHAIRMAN ROISMAN: And what about GMP?

6 MR. SMITH: To be honest, Chairman
7 Roisman, not sure we discussed that one. Yeah. I'm
8 not sure.

9 CHAIRMAN ROISMAN: Okay. And Mr.
10 Carpenter? What would you prefer us to do? And any
11 other representative of developers who are on the
12 line.

13 MR. CARPENTER: We don't have -- let me
14 turn my camera back on here. This is Dave Carpenter,
15 Green Lantern Solar. And we don't have an opinion.

16 CHAIRMAN ROISMAN: Anybody else?

17 MR. MARREN: I guess I'll just pipe up
18 and make clear if a new application is filed, the
19 commission would only make a decision on what steps
20 to take until after hearing from the applicant and
21 any other parties in that case. So --

22 CHAIRMAN ROISMAN: Of course.

23 MR. McNAMARA: Yeah. This is Ed
24 McNamara with the department. I will note that
25 depending -- I don't anticipate that the net-metering

1 rulemaking is just going to fly right through the
2 process and be resolved in the next two or three
3 months. And so I just want -- do want to note that
4 in terms of if there is an indefinite stay until this
5 is fully resolved, that's potentially a year out.

6 The department would be looking, yeah,
7 I'll just -- I'll leave it at that. And as Mr.
8 Marren stated, there would be individual case-by-case
9 basis as things come along as to how we would
10 respond.

11 CHAIRMAN ROISMAN: Okay. Thank you.

12 MR. MARREN: All right. Unless there
13 is anything else that folks want to discuss today, I
14 think we have exhausted our agenda. Thank you
15 everyone for coming.

16 MR. KIENY: Craig Kieny, VEC. One more
17 time. I just want to make sure that the comments
18 that are due on August 27th, are they addressing just
19 the department's proposal? Or anything to do with
20 how to move forward?

21 MR. MARREN: I think that they should
22 be focused on the SHEI issues. But, you know,
23 whether it is, you know, you want to advocate for
24 adopting the department's proposal, or taking other
25 steps, or making other changes to the rule, I think

1 that's all in bounds. I think the scope is really
2 SHEI-related issues and net metering is what we are
3 interested in hearing about.

4 MR. KIENY: Okay. Thank you.

5 MR. MARREN: We will have another
6 workshop to talk CPG issues and administrative
7 processes. And another workshop, to talk about net-
8 metering compensation generally, and I'm sure we will
9 have rounds of filings with each of those workshops
10 as well.

11 MR. McNAMARA: Mr. Marren, if I could
12 just ask for a clarification. You stated that it
13 would be limited to SHEI. Is the commission open to
14 non-SHEI constrained areas, locational adders
15 generally?

16 MR. MARREN: We talked about that
17 today. Yes, certainly I think that's in bounds.
18 Thanks for that clarification.

19 MR. McNAMARA: Okay. Great. Thank
20 you.

21 MS. RICHARDS: This is Patty Richards,
22 WEC. Will there be a summary of the memo in terms of
23 what comments are due for those that were not able to
24 attend?

25 MR. MARREN: I will issue a procedural

1 order. Sure.

2 MS. RICHARDS: Thank you.

3 MR. MARREN: Mr. Carpenter.

4 MR. CARPENTER: This is Dave Carpenter,
5 Green Lantern Solar. Just with regard to all of the
6 filings that went in in the 3304 docket, that was
7 closed out with no further action by the commission.

8 Is there a procedural mechanism to
9 incorporate those into the record for the current
10 rulemaking so we don't have to just resubmit the
11 exact same comments that we made the first time
12 around? There was an enormous amount of really good
13 information that came in during that proceeding, and
14 it would be a shame to put it in a box and stick it
15 in a warehouse somewhere.

16 MR. MARREN: I'm fairly confident we
17 can work out something to make that happen. I'll put
18 my head together with a couple other people here to
19 make sure we do that in the correct way, and we will
20 let you know.

21 But I think at this point you should
22 assume if you filed it in 3304, you don't need to
23 refile it here. You could just reference it if you
24 want to.

25 MR. CARPENTER: Yes. And the only

1 other thing I would add to the extent that the
2 service lists need to be compiled together, to make
3 sure that all the 3304 folks get added to the 19
4 whatever we are at. 0855 docket.

5 MR. MARREN: Thanks for that reminder.

6 MR. CARPENTER: Thank you.

7 MR. MARREN: All right. Commissioners,
8 do you want to say anything else? Or have any other
9 questions you would like resolved at this point?

10 (No response)

11 MR. MARREN: All right. I think we are
12 adjourned. Thank you everyone.

13 (Whereupon, the proceeding was
14 adjourned at 11:54 a.m.)
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C E R T I F I C A T E

I, Kim U. Sears, do hereby certify that I recorded by stenographic means the Workshop re: Case No. 19-0855-RULE, via videoconference, on July 27, 2021, beginning at 9:30 a.m.

I further certify that the foregoing testimony was taken by me stenographically and thereafter reduced to typewriting and the foregoing 94 pages are a transcript of the stenograph notes taken by me of the evidence and the proceedings to the best of my ability.

I further certify that I am not related to any of the parties thereto or their counsel, and I am in no way interested in the outcome of said cause.

Dated at Williston, Vermont, this 30th day of July, 2021.

A rectangular box containing a handwritten signature in cursive script that reads "Kim U. Sears".

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