STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 19-0855-Rule

Proposed revisions to Vermont Public
Utility Commission Rule 5.100

VERMONT ELECTRIC COOPERATIVE INC.'s COMMENTS

This document has been filed via ePUC

Vermont Electric Cooperative, Inc. (VEC) submits the following comments on the proposal by the Department of Public Service to create a locational "grid adjustor" for net metering projects located in the grid-constrained areas of the state, such as the Sheffield Highgate Export Interface (SHEI). VEC's comments here are limited to the grid adjuster issues and VEC will provide additional comments as to other proposed changes to the net metering rule when appropriate.

VEC echoes the initial comments submitted by Washington Electric Cooperative (WEC). Like WEC, VEC supports further development of renewable energy in Vermont and has worked with developers to build cost-effective renewable generation in Vermont. However, VEC also believes that it is important to locate new projects in areas that provide the most value to Vermont utility customers. That is simply not the case for new generation built in the SHEI.

VEC again offers its support for the grid adjuster that the Department proposed in Case No. 20-3304. It serves two important purposes: it mitigates the cost impacts to Vermont customers caused by new net metering generation in the SHEI and it sends a price signal that may encourage new net metering projects to be located in more beneficial parts of the state. The adjustor does not solve the grid constraints, but it is a simple way to mitigate their impacts.

In this case, the Department's proposal does not set the value of the adjuster but proposes a mechanism whereby a utility may request an adjuster for locations other than just in the SHEI. It also recommends the types of information the utility would need to provide to make its case. This is an interesting, albeit more complex, approach, and it would be good to have further discussion as to the need for locational adjusters in other parts of the state as well as the criteria that a utility would need to meet to get an adjuster approved. For example, the Department proposes that a utility would need to provide forecasted distributed generation within the constrained area and the expected effect of the adjuster on DG deployment, which might be difficult for a utility to know. It might be useful to discuss the process for setting an adjuster, the Department's involvement with the utility in that process, and the information necessary and relevant to the process.

Likewise, Green Mountain Power's initial comments broaden the discussion of adjusters beyond the scope anticipated initially in Case 20-3304 and merit further exploration. VEC is happy to engage in those discussions, recognizing that working through more complex proposals may delay the ability to quickly adopt an adjuster to address the SHEI constraints that exist today. One or more workshops may be the best way to explore these various approaches.

Thank you for the opportunity to comment.

Dated at Essex, Vermont this 17th day of September 2021.

VERMONT ELECTRIC COOPERATIVE

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