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Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620-2701

Re: Case No. 19-0855-RULE; Proposed Revisions to Vermont Public Utility Commission Rule 5.100

Dear Ms. Anderson:

On August 24, 2021, the Vermont Public Utility Commission (the “PUC” or “Commission”) held a workshop on proposed revisions to Rule 5.100 regarding the Certificate of Public Good (“CPG”) process and requested comments by September 24, 2021. Green Mountain Power (“GMP”) appreciates the opportunity to provide comments in this proceeding,

Commissioning Deadlines

There have been several proposals to extend the commissioning deadline from one year to two years. GMP does not support this proposal as it would negatively impact the interconnection queue. When projects are in the interconnection queue, other projects may not be able to be built and interconnected. For this reason, GMP suggests that the commissioning deadline remain one year.

5.107 Application Process

The 5.107 projects do not have any form that is required to be used, and projects are not required to use the 5.500 interconnection application. Absent the requirement to use some type of form, there is not a clear mechanism for the projects to enter or exit the queue. The lack of a form submittal also creates additional work on the part of the utility since we need to review testimony and other submittals to gather interconnection information for the project. GMP supports the development of a standard form for these projects to resolve these issues.

Interplay Between Net Metering and Interconnection Rules

The Department proposed two options to better align the net metering and interconnection rule – either having projects use the interconnection form along with the application or registration or making all net metering applications or registrations incorporate the interconnection provisions

of Rule 5.500. These proposals are somewhat consistent with GMP's position that all net metering interconnections should fall under Rule 5.500, and Rule 5.500 should be revised to enable different levels of review for different types of projects in order to streamline the entire process.

Case Numbers and Transfers

GMP also supports the use of consistent case numbers so that projects can be more easily tracked. The same case number should apply to a CPG project for amendments and transfers as well. When a project is transferred, notice of the transfer of a CPG should be provided to *both* the Interconnecting Utility and the Commission, so that there is one system of record to consult for the ownership history of a project.

Wholesale Markets and Net Metering

Recently, GMP was contacted by ISO-NE about whether a Vermont net metering project also can participate in the wholesale market. ISO-NE's position is that unless Vermont's net metering rule prohibited participation in the wholesale market, ISO-NE could not deny a net metering project access to the wholesale market. GMP agrees with the Department of Public Service ("DPS" or "Department") that a net metering project should not also participate in the wholesale market, and the rule should make that clear. During the workshop, a question arose about whether such a change would impact some of GMP's battery programs such as the Tesla Powerwall tariff. As we explained during the workshop, customers participating in that tariff are not also directly participating in the wholesale market, and the battery is not a net metering project. For these reasons, GMP does not believe this proposed change would impact customers participating in GMP's battery program.

Conclusion

We are pleased to participate in this proceeding and appreciate the extensive work done by the Commission, the Department and the other stakeholders. Thank you for the opportunity to comment, and if you have any questions or concerns, please feel free to contact me.

Sincerely,



Carolyn Browne Anderson
CBA

cc: ePUC Service List