

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 21-3883-RULE

Proposed creation of Vermont Public Utility     )  
Commission Rule Concerning Energy Storage     )

**VERMONT DEPARTMENT OF PUBLIC SERVICE**  
**MOTION TO CHANGE SCHEDULE**

On September 17, 2021, the Vermont Public Utility Commission (“Commission”) initiated an energy storage rulemaking proceeding and set a schedule for comments and workshops in the above-referenced matter. The Commission’s Order Opening Rulemaking sets out specific questions for participants, with initial comments due by October 22, 2021. The Vermont Department of Public Service (“Department”) respectfully requests an extension of the schedule by at least one month, as the Department’s available resources are consumed by both extensive participation in the development of the state’s inaugural Climate Action Plan (due December 1, 2021) and the statutory requirement to adopt an update to the Electrical Energy Plan and the Comprehensive Energy Plan by January 15, 2022. The latter requires the Department to complete drafts of those plans in the next few weeks in order to issue the public comment draft, conduct public hearings, and incorporate feedback.

The Department also hopes to have additional capacity to assist in the workshops by December, including bringing on board a Planning Engineer and entering into a contract with a technical consultant for interconnection matters (primarily in the context of Case No. 19-0856-RULE).

**This document has been electronically filed using ePUC**

Finally, the additional time requested may help bring somewhat more clarity to stakeholders on ISO-NE’s participation model for distributed energy resource (“DER”) aggregations, as it prepares to file tariffs to comply with FERC Order 2222 by February 2, 2022. While it is still unclear how Order 2222 will affect Vermont customers, it is important to understand the potential scale and modes of participation of DERs as Vermont considers the Commission’s *Topic 2: Aggregations and interplay between owners, operators, and utilities*.

For the foregoing reasons, the Department respectfully requests a change to the schedule as outlined below:

	Current Schedule	<i>Proposed Schedule</i>
Initial comments	Friday, October 22, 2021	Friday, December 3, 2021
Workshop on Topic 1: Simplified siting	Tuesday, November 9, 2021	Tuesday, December 14, 2021
Workshop on Topics 2 and 3: Aggregation and existing resources	Tuesday, November 16, 2021	Tuesday, December 21, 2021
Deadline for post-workshop comments	Tuesday, December 21, 2021	Friday, January 28, 2022

Thank you, and please contact me with any questions.

Dated at Montpelier, Vermont this 15th day of October, 2021.

VERMONT DEPARTMENT OF PUBLIC SERVICE

By:

/s/ Ben Civiletti  
Ben Civiletti, Special Counsel  
112 State Street  
Montpelier, VT 05602  
[benjamin.civiletti@vermont.gov](mailto:benjamin.civiletti@vermont.gov)