STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 19-0855-RULE

Proposed Revisions to Vermont Public Utility
Commission Rule 5.100

GREEN MOUNTAIN POWER POST-WORKSHOP COMMENTS

Green Mountain Power ("GMP") submits these reply comments to the October 15, 2021 comments following the September 16, 2021 workshop regarding net metering compensation in the above-referenced matter.

We have had the opportunity to review submitted comments. As many utilities and other stakeholders noted in their October 15, 2021 comments, the question before the Commission in this proceeding is not how much renewable generation we need now and in the future located here in Vermont. The question is whether the current structure equitably and affordably delivers the benefits of local renewable generation for customers. It does not. Particularly insightful were the Department of Public Service's comments regarding the need to keep front-of-mind the goals of the Global Warming Solutions Act, which requires that we prioritize the most cost-effective, technologically feasible and equitable greenhouse gas reduction path as we find ways to procure more local renewable generation.

The existing net metering structure does not promote equity; the net costs of the program are borne by non-participating customers who could be better served with less expensive renewable generation, freeing up dollars to spend on additional local generation or on other important strategic initiatives that would reduce emissions. That is why GMP believes that, at least with regard to offsite, remote net metering not directly serving customers where generation could be procured more cost-effectively, the cost imbalance tips too heavily against non-participating customers. Whether through this proceeding or elsewhere, GMP looks forward to helping create ways to procure more local renewable generation, more cost-effectively and benefitting more customers, than current policy allows.