

October 29, 2021

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

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

Dear Ms. Anderson,

On October 15, 2021, stakeholders submitted comments related to net metering compensation in the Public Utility Commission's (Commission) proceeding to update Rule 5.100. Vermont Public Power Supply Authority (VPPSA) submits the following comments in response to the October 15th filings.

Commentors were unanimous in their concern about climate change and calls for Vermont to achieve drastic carbon reductions. While there was consensus about the "problem," stakeholders offered differing opinions on how climate change will be most effectively addressed through Vermont policy. The distribution utilities and Department of Public Service (Department) argued on behalf of Vermont ratepayers that net metering compensation should be brought in line with the value provided and other, more affordable, sources of distributed generation should contribute more significantly to the state's renewable requirements. Representatives from the solar industry argued that the pace of net metering deployment must be accelerated, presumably through maintaining or increasing net metering compensation levels.

Combatting climate change will necessitate both individual and collective action. Where there is tension between providing benefits to individuals as opposed to benefits to all, the collective interest must be prioritized. Customers that wish to net meter should be afforded the opportunity to do so and be fairly compensated for any generation that they provide to their host utility. Customers that don't elect to net meter should not bear the costs of other Vermonters' decisions to self-generate. At existing compensation levels, Vermont's net metering program creates financial winners and losers; this current system is neither equitable nor sustainable.

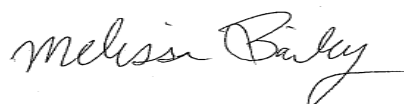
Net metering is neither the only nor the best method for deploying large quantities of in-state renewable generation. Vermont's regulated utilities are well positioned to provide safe, reliable,

affordable, and sustainable electricity to all Vermont customers. When paired with aggressive clean energy requirements, this regulatory structure provides the pathway by which the costs and benefits of renewable deployment can be shared equitably among ratepayers, and all customers can participate in the necessary energy transformation. Outside of the net metering program, solar developers work in partnership with utilities to deploy renewable energy projects that are cost-effective for customers and provide a return on investment to the solar industry.

As community owned, non-profit utilities, the primary consideration for the VPPSA members is the collective interest of our customers. Through that community lens, VPPSA observes that Vermont's climate goals will be met more efficiently, and *more* customers will be able to serve their electricity needs with affordable, local, solar resources if the Commission continues to reduce net metering compensation until it aligns with the value that generation provides to customers.

Thank you for your consideration of these comments. Please contact me (mbailey@vppsa.com or 802-882-8509) with any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Melissa Bailey". The signature is fluid and cursive, with the first name and last name clearly legible.

Melissa Bailey
Manager of Government and Member Affairs
Vermont Public Power Supply Authority