P. O. Box 512
Montpelier, Vermont 05601
October 29, 2021

Holly R. Anderson, Clerk
Public Utilities Commission
112 State Street, 4th Floor
Montpelier, Vermont 05620-2701

Subject: Proposed changes to PUC rule 5.100, pertaining to construction and operation of net-metering systems
Case number 19-0855-RULE
Responses to comments submitted October 15, 2021

Dear Ms. Anderson:

Thank you for the opportunity to comment on the proposed changes to rule 5.100. The Public Utilities Commission has requested responses to the comments submitted October 15, 2021. (Those comments focused on the workshop of September 16, which was on compensation to net metering systems.)

Should there be a cap on net metering?

Some comments are that solar net metering should not be limited in capacity and that larger net metering systems should be allowed.

The net metering statute requires the rules to govern whether there is a cumulative limit on the total amount of net metering. If there is a limit, to set one. Although the proceedings touched on the issue of limits, I am unaware that these proceedings really discussed a limit.

Until we figure out a seasonal storage method, or until we figure out a seasonal, alternative, renewable, additional, climate-beneficial, electricity source, I suggest that we need to discuss a limit on total net metering. (As testimony indicated, new or existing hydroelectricity is not climate-beneficial. So hydroelectricity is not a solution to the seasonal variation in solar electricity.) I do not know if I support such a limit. I think a discussion will be important.

On the other hand, the net metering statute (§ 8010) has two conflicting subdivisions. The statute requires that the rules ensure that all customers who want to participate may do so. The statute also requires the rules to govern whether there is a cumulative limit on the amount of net metering. If there is a limit, to set a limit on the total amount of net metering If there is a limit, how can one resolve that against assuring all customers an opportunity to participate?

Preferred sites

Some comments relate to the preferred sites.

There are nine preferred sites. The first eight seem to be mutually exclusive. The ninth is a site at the load: "On the same parcel as, or directly adjacent to, a customer that has been allocated more than 50 percent of the net-metering system's electrical output. . ." Some sites can qualify under both the ninth category and one of the other eight categories. I suggest considering whether to give an additional benefit to such a doubly-preferred site. I acknowledge that this makes the rule system a bit more complicated. However, preferred sites affect only systems greater than 15 kW, larger than systems for most residences or small businesses. I would think that those smaller systems are almost entirely located on the customer's premises. So my suggestion does not affect the procedure for the owners of small systems. All net metering systems had to be located on the premises of the customer (or one of the customers of a group system) until 2014.

Such a double preference might look like this. A system at a preferred site (1) through (9) receives a preferred compensation rate of a certain amount. A system at a preferred site (1) through (8) that is also eligible as a preferred site (9) would receive a larger compensation. Such an arrangement appears to require a re-configuration of the four compensation categories.

Relating to preferred site (7). The municipal letter option is not subject to the same level of public involvement and scrutiny as placing such sites in a duly adopted municipal plan. I think that the residents and citizens of a municipality deserve to have that level of input when the municipality is deciding on locations of net metering (or any energy) sites. Thus I support the removal of the municipal letter option within preferred site (7).

What about adding a preferred site relating to equity: serving low-income customers, or serving affordable housing, or some such?

On forests (or, homesites in the woods?)
On the forests issue. If a forested area is cleared for net metering (or any other renewable energy) then it really needs to be assisted in reforestation after the solar project has reached the end of its life and is dismantled. Otherwise, one ends up with a 3 to 6 acre (based on REV's spreadsheet), more or less level, sunny homesite with a driveway already installed. I believe that the end-of-life dismantling and reforestation is an important element.

Gather information on systems
We have some solar net-metered systems more than 20 years old. Net metering began in 1998. I found 73 net metering systems on the ePUC search function with filing dates 1/1/1997 through 12/31/2002. I think it would be useful to learn the status of those systems. Are they all in operation? If any are no longer in operation are they still on the roof or out in the field? Have they been removed? In those years, all systems were no more than 15 kW and all were wind or solar. (Some were expanded later by amendment of the CPG.) The sizes of these older systems is small compared to the 500-kW systems we have today.

Renewable Energy Vermont offerred to provide some cost data in their October 15 comments. I would have found it more useful if they had provided such data with that letter.

In addition, the application for a net-metering CPG omits the preferred site (1), existing structure, on page 5 where it lists the other preferred sites.

Thank you for taking the time to read these comments.

Sincerely,
Thomas Weiss