



December 16, 2021

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 19-3883-RULE, Proposed creation of Vermont Public Utility Commission Rule Concerning Energy Storage

Dear Ms. Anderson,

In response to the Public Utility Commission's ("Commission's") September 17, 2021 Order Opening Rulemaking in this case, Burlington Electric Department ("BED") provides the following comments.

Because BED has seen few storage facility applications and installations within its territory so far, BED does not have a deep body of experience from which to draw detailed recommendations for best practices for the review and permitting of such facilities at this stage. That said, BED recommends that the application and development requirements for storage facilities be at least as stringent as those for generation facilities with comparable capacities. Further, because storage facilities have grid impacts similar to that of both generation facilities and load, these requirements may need to be even more stringent than that of similarly sized generation facilities to account for both types of grid impacts. At a minimum, the review and permitting requirements for storage facilities should be no less than what is required for proposed generation facilities with similar grid impacts in the absence of a showing over time that storage facilities have less impact on the electric grid.

BED offers further input on the Commission's specific questions below:

Topic 1. Simplified siting

a. Threshold. The amended provision of § 248(u) states that "the Commission shall establish a simplified application process for energy storage facilities subject to this section with a capacity of up to 1 MW, unless it establishes a larger threshold by rule."

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Should the Commission establish a threshold larger than 1 MW for projects to be eligible for simplified siting? If not, why not? If so, what should that threshold be and why?

A 1 MW storage facility has up to a 2 MW range in potential impact on the grid when one accounts for the maximum potential load and generation capacity of such a facility. This is not a minimal impact, especially considering that the maximum capacity of a net-metering facility that is eligible for a streamlined registration review is 500 kW. BED does not support increasing this threshold even further in the absence of a showing that the scale of grid impacts of storage facilities is less than that of similarly sized generation facilities.

BED also notes that while the Commission is required to provide a simplified application process for storage facilities with a capacity of up to 1 MW, this simplified application process may require more review than what is required for a simplified application for generation facilities. In other words, something more than a registration-like process may be necessary to sufficiently consider the impacts of a storage facilities up to 1 MW in capacity.

b. Conditional waivers. Which, if any, Section 248 criteria and requirements for a CPG should be conditionally waived?

There are no Section 248 CPG criteria that stand out as being conditionally waivable for storage facilities.

d. Application materials. What application materials should stand-alone storage facilities be required to file to be considered administratively complete?

Proposed storage facility applicants should provide at least the same information and materials as is currently required for comparably sized generation facilities.

e. Retrofitting. Would the list of applicable § 248 criteria or the list of materials to be filed be different for storage facilities that are being added to existing facilities (e.g., an existing solar facility with a CPG adding storage)? How should the Commission consider cumulative impacts of adding storage to existing facilities?

Regardless of whether storage facilities are paired with existing generation facilities or are installed as stand-alone facilities, it is BED's understanding that the potential for new grid impacts will be the same. Therefore, BED does not think there should be any less information or application materials required for storage facilities that are added to existing facilities than what would be required for a proposed stand-alone storage facility.

Topic 2. Aggregations and interplay between owners, operators, and utilities

a. Visibility to utilities. Are there specific requirements related to two-way communications with distribution utilities that the Commission should impose on aggregators as a condition of receiving a § 231 CPG?

BED notes that VELCO has proposed that all generation facilities with capacities of 150 kW or greater be required to have two-way communication capabilities. BED recommends that storage facilities be included in such a requirement if it were to move forward.

c. Notice of changes to an aggregation. Aggregations are likely to change over time. For example, small resources may leave or join aggregations rather frequently. What requirements for notice should be included in § 231 CPGs when changes occur to aggregations?

At present, municipal utilities are not required to allow for aggregations of storage. If municipalities were required to allow for aggregations of storage, BED suggests that requiring notice of any changes to those aggregations be consistent with the existing requirements for notice of changes to group net-metering systems would be a reasonable approach.

Thank you for the opportunity to provide comments. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,



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