



State of Vermont
Department of Public Service
112 State Street
Montpelier, VT 05620-2601
<http://public.service.vermont.gov>

[phone] 802-828-2811
[fax] 802-828-2342
[tdd] 800-734-8390

January 13, 2022

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620-2701

RE: Tariff No. 21-5254-TF – Green Mountain Power

Dear Ms. Anderson:

On December 15, 2021, Green Mountain Power Corporation (“GMP”) filed for approval by the Vermont Public Utility Commission (“PUC” or the “Commission”) tariff sheets extending the term of the Bring Your Own Device Program (“BYOD”) and Energy Storage System Service (“ESS”) tariffs that were approved by the PUC on May 20, 2020 in Case Nos. 19-3537-TF and 19-3167-TF. The original term of the two tariffs is from June 1, 2020 through September 30, 2022. The only material adjustments proposed to the rates, eligibility, and conditions of the tariffs are an adjustment to the term length of both offerings and a clarification to benefit customers that BYOD systems will be required to permit grid-charging (the existing tariff is silent on this point). GMP requests extension for both tariffs until September 30, 2026, which is the requested end of the proposed Multi-Year Regulation Plan (“MYRP”) filed with the Commission in September 2021(Case No. 21-3707-PET). GMP requests an effective date of January 29, 2022.

GMP explains that when the two tariffs were approved, the Commission set an initial expiration date of September 30, 2022, in recognition that the residential-scale energy storage market was nascent and that further review of the uptake by customers and GMP’s role in the marketplace would be appropriate after some further period of market development. However, the pandemic has created both economic and supply chain disruption over nearly two years of the initial terms of the programs. GMP states that while the ESS tariff is well-subscribed, installations in the past year have lagged due to pandemic shutdowns and supply chain challenges, and overall participation in the BYOD tariff has not yet approached the 5 MW per year that was approved by the PUC. GMP believes that this indicates there is a continued need for market development in battery storage and justifies an extension of both GMP’s direct participation in the market through utility-owned equipment via the ESS tariff and the customer-owned model through the BYOD tariff, and that these tariffs will continue to provide a way for customers to install clean backup energy.

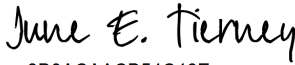
GMP indicates that in the past year, the systems in these programs, along with the battery systems in all the preceding battery pilots, provided \$1.9 million in savings for all customers when deployed for peak events. GMP also notes that nearly 200 battery installations have been performed by Vermont-based energy service companies and its expectation is that this will continue to grow as supply chain disruptions are lessened.

For customer clarity, GMP has also added language that BYOD systems will be required to enable grid charging so that customers can deliver on their commitment for energy sharing that enabled their upfront incentive. This will ensure BYOD customers are not left with a battery that has been discharged for load management purposes per their agreement and has not had an opportunity to recharge via solar generation only before extended inclement weather could produce potential outages. The Customer Lease Agreements will also be conformed to provide this clarification.

GMP asserts that extending the term of both these programs will allow for the market to stabilize and grow as it continues to emerge from the effects of the pandemic and will support the continued deployment of a fleet of distributed batteries to be used to reduce Vermont's carbon footprint by reducing demand at peak times. These extensions will provide energy services companies, working with GMP, with the opportunity to bring the battery market to greater maturity while aiding Vermont's important climate goals.

The Department has reviewed GMP's filing, including supporting workpapers, and is satisfied with the reasonableness and accuracy of the information provided by GMP. The Department finds that the proposed tariff revisions comply with 30 V.S.A. §225(a) and benefit all customers by sharing savings. Therefore, we recommend that the Commission approve the tariffs, effective January 29, 2022, as requested, without a hearing or investigation.

Kind regards,

DocuSigned by:

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June E. Tierney
Commissioner

cc: Josh Castonguay