

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-5254-TF

Tariff filing of Green Mountain Power Corporation)
for extension of Bring Your Own Device Program)
and Energy Storage System Service tariffs effective)
on bills rendered on or after January 29, 2022)

**DEPARTMENT OF PUBLIC SERVICE'S RESPONSE
TO RENEWABLE ENERGY VERMONT'S PUBLIC COMMENT**

On January 18, 2022, Renewable Energy Vermont ("REV") filed a Public Comment in the above-captioned matter. On January 19, 2022, the Vermont Public Utility Commission issued a Procedural Order Setting Response Deadline to the REV's filing.

The Department of Public Service ("Department") appreciates REV highlighting the implications of Green Mountain Power's ("GMP") proposed addition to its Bring Your Own Device ("BYOD") tariff language to require customers receiving the BYOD incentive to allow grid charging. Grid charging could jeopardize a customer's ability to claim the federal residential Investment Tax Credit ("ITC"), which currently requires charging 100% from the solar facility. At the same time, the Department understands the rationale for the changes proposed by GMP, which would ensure that not only are an individual customer's batteries available for resiliency but also that sufficient battery capacity exists to respond to peak events, which is after all the reason for GMP offering a payment to customers for their batteries in the first place.

There are several distinct issues at play: technical battery capabilities; operational limitations based on incentive structures; and customer expectations. From a technical perspective, using a battery for resilience is not at odds with using it for aggregated utility-wide grid services. Batteries enrolled in GMP's Powerwall program are managed to achieve both. In

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that program, the federal residential ITC does not come in to play and thus does not impose the choice between optimizing for resilience, optimizing for aggregated grid services, or sub-optimally achieving (or failing at) both. A customer expecting to reap the full benefit for both the ITC and the BYOD incentive will inevitably be disappointed by the physical limitations that solar-recharge-only imposes on their battery's availability after a discharge, either for resilience or for acceptable performance in the BYOD tariff. And GMP's ratepayers should not be expected to pay for grid services that aren't being provided.

For those reasons, GMP's proposed condition on grid charging appears to be reasonable. It will likely result in customers needing to choose between one incentive (the ITC) or the other (the up-front BYOD incentive), at least until such time as a standalone storage ITC without a solar-recharge-only condition materializes. It's possible a middle pathway – a discounted “solar-recharge-only” BYOD tariff, or a performance-based (not up-front payment) BYOD tariff – could be explored, but these may not be very compelling options for customers.

Regardless, the onus of communicating with customers about the implications of their choices should be on the entity from whom they purchase or lease their battery storage system, which should make itself easily accessible for the purposes of receiving and addressing customer concerns.

As such, the Department continues to recommend approval of the tariff as submitted.

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Dated at Montpelier, Vermont this 24th day of January, 2022.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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