

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	
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Order entered: 01/26/2022

ORDER OPENING INVESTIGATION and SUSPENDING TARIFF FILING

I. INTRODUCTION

On December 15, 2021, Green Mountain Power Corporation (“GMP”) made a tariff filing with the Vermont Public Utility Commission (“Commission”) to extend the expiration date from September 30, 2022, to September 30, 2026, for its Bring Your Own Device (“BYOD”) and Energy Storage System (“ESS”) tariffs (Case Nos. 19-3537-TF and 19-3167-TF, respectively). The tariff change also includes a clarification to the BYOD tariff requiring that BYOD systems be able to charge from the grid. (The tariff is presently silent on this point.) The tariff changes are proposed to take effect on a service-rendered basis beginning January 29, 2022, although GMP’s filings make clear that the actual impact of any changes would not occur until October 1, 2022.

GMP requests extensions for both tariffs until September 30, 2026, which is the requested end of the proposed Multi-Year Regulation Plan (“MYRP”) under consideration by the Commission in Case No. 21-3707-PET. GMP notes that supply-chain disruptions caused by the pandemic and limitations on entry into customer homes delayed the full implementation of the ESS program. As a result, more time is needed for the battery market in Vermont to develop with utility support.

On January 13, 2022, the Vermont Department of Public Service (“Department”) filed comments on the tariff filing. The Department states that it has reviewed GMP’s filing, including supporting workpapers, and is satisfied with the reasonableness and accuracy of the information. The Department states that the proposed tariff revisions comply with 30 V.S.A.

§ 225(a) and benefit all customers by sharing savings. Therefore, the Department recommends that the Commission approve the tariffs without a hearing or investigation.

On January 18, 2022, Renewable Energy Vermont (“REV”) filed a public comment requesting that the Commission approve the extension of the BYOD tariff term and reject the “new mandatory grid-charging requirement.” REV explains that it is concerned that energy storage devices associated with residential solar systems that are connected to the grid will not be eligible for a federal investment tax credit (“ITC”) because the ITC requires that storage systems recharge exclusively with solar energy.

On January 21, 2022, GMP filed a response to REV’s public comment. GMP explains that with the new language, customers will need to choose between the Solar ITC and the BYOD incentive, depending on which is most beneficial to them. Customers who choose the BYOD incentive will need to ensure that their systems are set up to deliver the intended benefits. GMP states that the new language clarifying that BYOD customers are required to enable grid charging will apply to new BYOD customers enrolling after October 1, 2022.

On January 24, 2022, the Department filed comments stating that it continues to support the proposed tariff changes.

II. DISCUSSION

Section 225 of Title 30 of the Vermont Statutes Annotated requires the Commission to open an investigation into a tariff filing if the Department opposes the change. Additionally, the Commission may, on its own motion, conduct an investigation into the justness and reasonableness of the change. The Department has not requested an investigation; however, REV has raised concerns related to GMP’s requirement that BYOD systems be enabled to charge from the grid, as that could impact customers’ ability to make use of the ITC. The Commission opens an investigation into the justness and reasonableness of the tariff changes and suspends the changes until the final determination of this proceeding.

Pursuant to 30 V.S.A. §§ 20 and 21, GMP will be responsible for court reporter costs incurred by the Commission during the course of this proceeding and billed back to GMP.

III. ORDER

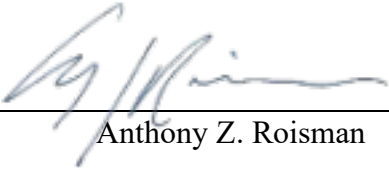
IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission (“Commission”) of the State of Vermont that:

1. Pursuant to 30 V.S.A. §§ 225 and 227(a), the Commission opens an investigation into the justness and reasonableness of Green Mountain Power Corporation’s proposed tariff revisions as filed with the Commission on December 15, 2021.

2. The tariff filing is suspended and shall not become effective until final determination of these proceedings.

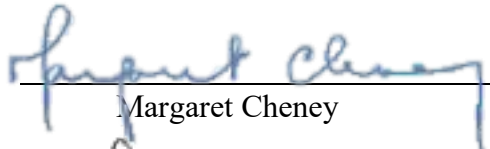
3. Pursuant to 30 V.S.A. § 8, Andrea Poppiti, is appointed to serve as the hearing officer to conduct the proceedings in this matter.

Dated at Montpelier, Vermont, this 26th day of January, 2022.



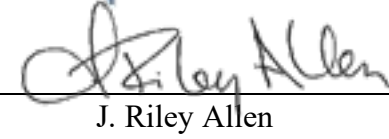
Anthony Z. Roisman)

PUBLIC UTILITY



Margaret Cheney)

COMMISSION

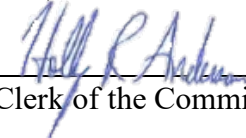


J. Riley Allen)

OF VERMONT

OFFICE OF THE CLERK

Filed: January 26, 2022

Attest: 

Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

PUC Case No. 21-5254-TF - SERVICE LIST

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