

March 23, 2022

Via ePUC and First Class Mail

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
Peoples United Bank Building, 4th Floor
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 21-5254-TF – Extension of Bring Your Own Device Program and Energy Storage System Service Tariffs

Dear Ms. Anderson:

As indicated in our March 8, 2022 letter, Green Mountain Power's (GMP) has worked with Renewable Energy Vermont (REV) to address comments related to the Bring Your Own Device (BYOD) Tariff, which sought an alternative to allow solar-only charging for storage devices as required for utilizing the solar Investment Tax Credit. GMP and REV have agreed on the terms for implementing a separate BYOD tariff to provide for solar-only charging, including an adjusted incentive for this new tariff to properly reflect the value to other GMP customers for systems that are not able to charge from the grid. This new tariff complements the tariff as filed in this proceeding, which is specific to grid-enabled systems.

To implement this agreed approach, enclosed please find:

- (1) The new BYOD solar charging tariff;
- (2) An estimate of revenues and costs attributable to the solar charging tariff (pursuant to Rule 2.401(c));¹
- (3) An amended BYOD grid charging tariff in clean and redline versions, reflecting a minor modification to make clear that the total combined annual limit for both BYOD programs remains at 5MWs; and
- (4) Updated estimate of revenue and costs for the grid charging tariff (reflecting updated assumptions about enrollments between the two BYOD tariffs).


The presently authorized BYOD tariff program runs through September 30, 2022, and if approved, GMP will implement both the solar and grid charging BYOD tariffs on October 1, 2022. The attached BYOD solar charging tariff reflects this implementation date, and if approved GMP can file updated compliance versions of the BYOD grid charging tariff with this effective date.

¹ The new solar charging tariff will also be filed as a new tariff on ePUC along with the supporting required financial analysis.

GMP has shared copies of the BYOD solar charging tariff and the revised BYOD grid charging tariff with REV and the Department of Public Service (DPS). We are authorized to state that REV supports the new and amended BYOD tariffs. DPS has indicated that they will file separate comment on the tariffs and GMP supports DPS's request to provide separate comment on the proposed tariffs by April 4, 2022.

Thank you, and if you have any questions, please feel free to contact me.

Sincerely,



Geoffrey H. Hand, Esq.

Dunkiel Saunders Elliott Raubvogel & Hand, PLLC

cc: Department of Public Service, Renewable Energy Vermont (via ePUC)

