



Vermont Agency of Natural Resources

Office of Planning

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April 8, 2022

Holly R. Anderson, Clerk
Vermont Public Utility Commission
112 State Street – 4th Floor
Montpelier, VT 05620-2701

Re: 22-0334-INV, Biennial Update Comments

Dear Ms. Anderson:

On February 4, 2022, the Vermont Public Utility Commission (“Commission”) issued an order opening the biennial update proceeding required under Commission Rule 5.128. On March 15, 2022, following a request for an extension of time by the Department of Public Service (“Department”), the Commission set April 8, 2022 as the date by which the Department and Agency of Natural Resources (“Agency”) may submit proposed updates to the net-metering program’s: (1) tradeable renewable energy credit adjustors; (2) siting adjustors; (3) statewide blended residential rate; and (4) eligibility criteria applicable to Categories I, II, III, and IV net-metering systems. This is the third biennial update proceeding under the current net-metering rule.

The Agency defers to the Department on items (1) and (3) and proposes no updates to items (2) and (4). Consistent with the Commission’s final order in the first biennial update, the Agency understands that its current concerns with the net-metering program are more appropriately considered in Case No. 19-0855-RULE.¹

Respectfully submitted,

/s/ Kevin Anderson

Kevin Anderson

Regulatory Policy Analyst

Cc: Service List

¹ Final Order in the 2018 Biennial Update of the Net-Metering Program, issued May 1, 2018, at 53.