

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 19-0856-RULE

Proposed revisions to Vermont Public
Utility Commission Rule 5.500

**VERMONT DEPARTMENT OF PUBLIC SERVICE REQUEST TO EXTEND REPLY
COMMENTS REGARDING POTENTIAL CHANGES TO VERMONT PUBLIC UTILITY
COMMISSION RULE 5.500**

On February 11, 2022, the stakeholders participating in this proceeding filed comments and recommendations regarding the Vermont Public Utility Commission’s (“Commission”) draft proposal for a revised Rule 5.500, which governs the interconnection of electric generators to the electric grid.

On March 15, 2022, the Commission requested replies to these comments and expressly asked for recommendations on whether it should adopt or reject the various amendments and redline edits proposed by Green Mountain Power Corporation (“GMP”) and the Interstate Renewable Energy Council (“IREC”), respectively.

The Vermont Department of Public Service (“Department”) respectfully requests that its opportunity to comment be reserved. The Department has reviewed these filings and maintains that comments are premature.¹ This is

¹ Given that revised amendments and redlines are anticipated, it is difficult to know where inconsistencies or issues will remain and what the Department’s ultimate position would be, until the issues are more clearly known. For example, the Department has concerns, and could provide recommendations, regarding IREC’s redline proposals in Rules 5.501(C) (reconciling it with 30 V.S.A. § 248), 5.504 (regarding its efficiency), 5.515 (to better synchronize the “ombudsperson” concept with the Commission’s adjudicative role), and various size thresholds, but it is unclear what a revised redline might do to alter those aspects. The Department also notes that there appear to be disagreements between stakeholders and the redline amendments regarding various system size/output thresholds.

In general, where an inconsistency with national norms exists, the Department recommends that the Rule remain consistent with Vermont’s policies, programs, rules, and

largely because the Department understands that GMP and IREC have been in communication regarding their respective Rule 5.500 amendment recommendations, including the areas of disagreement between them. The Department is also of the understanding that revised redlines are likely to be submitted by one, or both, of these participants; with some areas of inconsistency having been resolved, with others remaining, such that comments on those proposed amendments to the Commission's draft could be premature until the reconciliation efforts can be reviewed and understood. As such, the Department respectfully requests that its opportunity to comment be reserved until two weeks after it has had an opportunity to review the anticipated revisions.

Thank you for the opportunity to comment, please do not hesitate to contact me with further questions.

Dated in Montpelier, Vermont on this 15th day of April 2022.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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laws – and that it uses the existing size thresholds, or as needed to best protect the needs of the State's electric system.