

April 25, 2022

Holly R. Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620-2071

Re: 22-0334-INV, Biennial Net Metering Program Update Comments

Dear Ms. Anderson,

In response to the Department of Public Service's Comments and Recommendations on the Biennial Update of the Net Metering Program on April 8, 2022, VPPSA would like to offer the following supporting comments.

In each Biennial Update of the Net Metering Program, VPPSA has continued to advocate for making the benefits of renewable power available to all customers in the most equitable and cost-effective manner possible. VPPSA continues to believe net metering rates should not exceed their generation value and that there are lower cost alternatives available. VPPSA agrees that the costs of net metering continue to be shifted to non-participating customers, raising questions regarding the equitable distribution of net metering benefits.

VPPSA sees the Department's comments and recommendations as taking steps to better balance costs and benefits from the net metering program, in light of lower cost alternatives available. VPPSA agrees with the Department's statement:

...Vermonters can greatly reduce the State's greenhouse gas emissions by switching to electric vehicles, electric heating, and the like. However, the more expensive electricity is, the less attractive this switch will be for consumers.

With more cost-effective alternatives available, subsidized net metering rates have the result of imposing rate pressure on customers across all sectors. Increased rate pressure ultimately undermines the State's overall climate, energy, and electrification goals across major fossil fuel sectors; higher electric costs discourage progress toward Vermont's greenhouse gas reduction requirements.

VPPSA agrees with the Department's justification of a modest, "downward adjustment to net-metering compensation" along with pursuing lower-cost alternatives that have also supported the State's climate and energy goals.

Sincerely,

Sarah Braese
Manager of Government & Member Relations
Vermont Public Power Supply Authority