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May 27, 2022

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602

Re: Case No. 19-0855-RULE. Proposed revisions to Vermont Public Utility Commission Rule 5.100

Dear Ms. Anderson:

On April 29th, 2022, the Vermont Public Utilities Commission ('Commission') issued an Order requesting stakeholder comments to the Commission's proposed changes to Commission Rule 5.100. The Commission requested response by written comments on or before May 27, 2022.

The Town of Stowe Electric Department ('Stowe') thanks the Commission for the opportunity to file comments on the proposed rule changes. Stowe is generally supportive of the draft comments offered by the Commission and applauds the proposal requiring that interconnection approval for net metering applicants be granted before filing a registration for a Certificate of Public Good (CPG).

The first issue that Stowe seeks to address concerns clarification regarding the issue of requiring interconnection approval prior to filing a registration for a CPG in the context of the amendment process. It appears that the proposed draft rule fails to require prior interconnection approval for amendments to net metering applications where the amendment to a pending registration or application changes the proposed capacity of the net metering system. As drafted, Section 108 of the proposed Commission Rule draft does not explicitly require the applicant to address interconnection related issues prior to submission of an amendment.

To address this issue, Stowe suggests a clarifying insert to impose the concept of prior interconnection approval by the host Distribution Utility to address amendments altering the capacity of a net metering system. Inclusion of such a clarification will avoid continual objections by Distribution Utilities during the CPG process where amendments could affect interconnection requirements. Stowe suggests the insert of a reference to Rule 5.500, Section 5.504 (f), within Section 108 of the proposed Commission Rule to address this point.

As a separate matter, in the Commission's April 29, 2022, Order, a reference to Section 5.136 of the Commission's Draft Rule states that the changes proposed implement the proposal for grid mitigation fees investigated in Case No. 20-3304-PET. However, the language used in the Commission's Draft Order is rather general and invites the filing of a tariff for the purpose of assessing mitigation fees for the impact of installation additional generation within a known constrained area. Stowe seeks clarification of whether the intent is to allow Distribution Utilities the ability to file grid mitigation tariffs that could otherwise address constraints solely within their service territory, or rather whether this section is intended to be limited to the issues raised in Case No. 20-33-4-PET. Stowe notes that Green Mountain Power has filed a TGFOV tariff that effectively operates as a form of mitigation tariff for this purpose. Stowe respectfully seeks further clarification from the Commission on this issue.

III. Conclusion

Stowe thanks the Commission for this opportunity to comment and looks forward to continued participation in the rulemaking process for Commission Rules 5.100 and 5.500.

Sincerely,

/s/

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