



May 27, 2022

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

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

Dear Ms. Anderson,

In response to the Public Utility Commission's ("Commission's") April 29, 2022, Order Requesting Comments on Draft Rule, Burlington Electric Department ("BED") submits the following comments:

5.103 Definitions

BED recognizes the challenge in crafting a "substantial change" definition that is broad enough to encompass a wide range of potential scenarios yet specific enough for applicants to know whether a proposed change to a facility amounts to substantial. If possible, BED recommends adding more specificity to the proposed definition so that applicants will be able to determine what scale of facility changes are likely to create a "significant impact" in the absence of seeking a Commission determination on this question.

5.131 Interconnection Requirements

As noted in BED's April 15, 2022, comment letter in Case No. 19-0856-RULE, in Green Mountain Power's ("GMP's") February 11, 2022, proposed changes to the interconnection rule draft, the proposed language for 5.506¹ may create potential for confusion and duplication of interconnection application requirements with net-metering application requirements. BED notes this issue in this rulemaking as well to make sure both rules include consistent application procedures for interconnection of net-metering facilities. For instance, 5.105 of the draft net-metering rule provides, "the applicant must obtain approval to interconnect the proposed net-metering system to

¹ Proposed GMP language for 5.506 Application

(A) The proper completed Application Form based on the project size

1. 150 kW or less – the Registration Form reference in Rule 5.100.

2. Greater than 150 kW – must use the 5.500 Application Form.

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the interconnecting utility's distribution system before filing a registration." However, if the interconnection rule includes GMP's proposed language, 5.506 will require facilities 150kW or less to use the registration form as an interconnection application. In effect, an applicant would be required to submit two registration forms for the same project. BED requests that the two draft rules be reconciled to avoid a potential conflict or duplication of application requirements.

5.136 Mitigation Fee for Constrained Areas of the Grid

BED seeks the Commission's input on whether the Commission would prefer that mitigation fees that a utility may propose in a tariff under this provision be calculated based on a proposed storage facility's kW capacity in AC or DC.

Thank you for the opportunity to provide comments. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,



Amber Widmayer
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