**STATE OF VERMONT**
**PUBLIC UTILITY COMMISSION**

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| Proposed revisions to Vermont Public Utility Commission Rule 5.100 | )<br>)<br>) | Case No. 19-0855-RULE |

## GREEN MOUNTAIN POWER COMMENTS

Green Mountain Power ("GMP") appreciates the opportunity to provide the following comments in response to the Commission's Order of April 29, 2022 ("Order") in the above-referenced rulemaking proceeding. The Commission's Order provided a section-by-section summary of each proposed change. GMP's comments follow that format, responding to some of the Commission's proposed changes.

**Section 5.103 –- Definition of "Group Net-Metering System"**

The following is the definition of "Group Net-Metering System" shown with the Commission's April 29, 2022 proposed changes accepted and GMP's further proposed changes indicated in strike-through formatting:

> "Group Net-Metering System" means a net-metering system serving more than one customer, or a single customer with multiple electric meters, located within the service area of the same retail electricity provider. ~~Various buildings owned by municipalities, including water and wastewater districts, fire districts, villages, school districts, and towns, may constitute a group net-metering system. A union or district school facility shall be considered in the same group net-metering system with buildings of its member municipalities that are located within the service area of the same retail electricity provider that serves the facility.~~

GMP recommends shortening the definition of "Group Net-Metering System" by removing the last two sentences, as indicated, which identify the types of customers that can group net-meter as no longer needed.

**Section 5.103 – Definition of "Net-Metering"**

The following is the definition of "Net-Metering" shown with the Commission's April 29, 2022 proposed changes to Section 5.103 accepted and GMP's further proposed changes indicated in strike-through formatting:

> "Net-Metering" means measuring the difference between the electricity supplied to a customer and the electricity fed back by the customer's net-metering system(s) during the customer's billing period:
>
> > (1) using a single, non-demand meter or such other meter that would otherwise be applicable to the customer's usage but for the use of net-metering; or
> > ~~(2) if the system serves more than one customer, using multiple meters. The calculation shall be made by converting all meters to a non-demand, non-time-of-day meter, and equalizing them to the tariffed kWh rate.~~

GMP recommends deleting subsection two of the proposed definition of "Net-Metering" to make the definition consistent with the calculation of monetized credits for group net-metering systems as defined in Rule 5.126 and 5.127. If a system serves more than one customer, then it already is defined as a group net-metering system. The last sentence of the Commission's draft refers to a calculation (the difference between electricity supplied by the grid and electricity supplied by the generation) and would appear to require a conversion of all meters to a non-demand, non-time-of-day meter. However, these conversions are not done for group net-metering systems. Rather, monetized credits are allocated to member accounts in accordance with Rule 5.126 and 5.127.

**Sections 5.106(E)(9), 5.107, and 5.108**

The Commission proposes that proof of interconnection approval be included with the application. GMP understands that ultimately interconnection is the responsibility of the distribution utilities ("DU" or "DUs"); GMP has proposed along with other parties that all interconnection related matters be handled under proposed Rule 5.500. We also understand the goal for the PUC is likely to reduce the amount of back-and-forth administration needed during the interconnection and CPG process. GMP has concerns with how the queue would be managed under the Commission's proposal in the event a project requests interconnection review prior to filing for CPG but then fails to file for a CPG. This could impact later queued projects, possibly increasing interconnection costs regardless of whether previous projects actually moved forward.

GMP recommends the Commission keep the current simultaneous timing for filing the interconnection request and the CPG application or registration, maintaining both processes in parallel. To address the administrative efficiency goal, the Rule could be modified to state that unless the DU or applicant raise a specific concern within the allotted time, there is nothing further for the PUC to do with respect to interconnection. If the DU determines more time is needed to perform the study, the CPG could be deemed issued with a standing condition that interconnection requirements put forth by the DU must be completed prior to energizing, and then it would be the responsibility of the DU and applicant to make sure these are complete prior to connecting the project.

**Section 5.110 – Transfer and Abandonment of CPGs**

The Commission proposes that customers with CPGs no longer file CPG transfer forms when they sell their homes. GMP recommends that the Commission retain the original requirement for transfer. If this change is made, Commission and DU records will be out of sync, and it will be difficult for the DUs to maintain accurate information.

The Commission also proposes to extend the time to commission a project from one to two years. We understand that, at present, supply chain issues are creating some longer lead times and would suggest the Commission instead adopt a time-limited extension of commissioning from one to two years, with a specific sunset. We are focused on effective interconnection queue management and maintaining an incentive for projects to move forward so they can either be constructed or removed from the queue. Temporarily allowing two years for commissioning for projects filed through a date certain would help protect these goals.

**Section 5.129 – Billing Standards and Procedures**

GMP supports the proposed language.

**Section 5.136 – Mitigation Fee for Constrained Areas of the Grid**

While there is room for much more local renewable generation, GMP supports amending the Rule to address the potential cost impacts to customers caused by additional distributed generation ("DG") in some areas of Vermont in at least two types of situations:

> (1) In an existing export-constrained area of the transmission system, additional DG can increase how often an export interface is congested, resulting in additional curtailment of existing renewable generation and additional congestion costs impacting customers.
>
> (2) In areas where there is limited room on the transmission or distribution system to accommodate additional local generation, such generation can advance the need for grid upgrade projects or increase their required scale. This can be the case whether or not there is a presently defined operational constraint in the area.

As drafted, Rule 5.136 appears to only address the first of these two situations. GMP's recommendation is that the Commission broaden the proposed Rule so that it could be used, subject to Commission review and approval, as a way to help address either of the situations summarized above. Strictly limiting the magnitude of a net-metering price adjustor or fee to reflect "incremental economic harm" may not provide sufficient flexibility for the Commission to balance the pace of development with potential grid upgrade costs. GMP recommends the Commission adopt Rule language that more closely reflects the Department's September 17, 2021 proposal, as it provides an opportunity to address both type of situations cited above and offers more flexibility to the Commission, even if the Commission maintains the proposal to do so by tariff rather than during the biennial process as recommended by the Department and GMP.

**Section 5.137 – Energy Storage Facility Electrically Connected to a Net-Metering System**

GMP generally supports this new section of the Rule. While the Commission's proposal states that electricity drawn from a source other than the net-metered system such as the grid or other generator will not receive net-metering credits, the term "net-metering credits" is not defined. GMP assumes these credits are the various adjustors, mainly the REC and Siting adjustors, but this should be clarified. Electricity from the grid or another non-net-metered resource that charges a battery should not in turn be discharged and receive Net-Metering Credits. However, this same energy should continue to be netted at the main meter if the customer is paying full retail for the energy that was originally used to charge the energy storage facility.

GMP appreciates the opportunity to provide these comments. Please do not hesitate to reach out with any questions.

DATED at Rutland, Vermont this 27th day of May, 2022.

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