

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 19-0856-RULE

Proposed revisions to Vermont Public Utility Commission Rule 5.500	
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Order entered: 06/03/2022

REQUESTS FOR INFORMATION AND COMMENT ON DRAFT FORMS

I. INTRODUCTION

This proceeding pertains to the proposed revisions to Vermont Public Utility Commission (“Commission”) Rule 5.500 regarding interconnection.

Commission staff requests that in preparation for the workshop scheduled for June 14, 2022, participants consider the following questions and come prepared to discuss them at the workshop. The first set of questions pertain to the draft rule language submitted by Green Mountain Power Corporation (“GMP”) on April 15, 2022. The second set of questions address draft model applications forms for distributed energy resources (“DER”) that are appended to this Order. An opportunity for written filings addressing the issues raised in this order will be provided after the workshop.

II. QUESTIONS FOR THE JUNE 14 WORKSHOP

Questions pertaining to GMP’s draft rule language filed on April 15, 2022

1. In 5.502(45) on page 6, GMP proposes adding requirements to site control. Why?
2. In 5.503(F) on page 8, GMP has added some proposed language about ISO-NE review. Commission staff would like to discuss how the timelines in 5.500 relate to other affected utility timelines, ISO-NE timelines, VELCO timelines, and distribution utility timelines. Specifically, how will applicants know which process applies to their project and which timelines apply?
3. In 5.506 GMP proposes to use the “Registration Form referenced in Rule 5.100” as the interconnection application for DERs with a capacity of 150 kw or less. Please clarify what form GMP is referring to. For example, a ground-mounted photovoltaic system with a capacity of 150 kW would not file any registration or application form with the

Commission but would file a petition supported by testimony and exhibits. Also, a 50 kW storage system would not make any filing under Rule 5.100.

4. GMP's proposals in 5.506(A) and 5.110(A) contemplate that the filing forms and procedures used to for reviewing net-metering certificate of public good (CPG") can be used in the interconnection process. Participants are requested to come prepared to discuss the pros and cons of conducting CPG and interconnection reviews concurrently or separately.
5. In 5.506(b) on page 10, should and how might the Commission include two-way communications requirements between the distribution utility and aggregated resources (see GMP comment A4)?
6. The following questions pertain to 5.508(B), in which GMP proposes that the Interconnecting Utility will provide a copy of the application to VELCO and VELCO will notify the Interconnecting Utility within 30 days if a Transmission Level study will be needed.
 - a. Are there size limits that should apply to this process? (e.g. notification required only for Projects larger than 150 kW)
 - b. Is there a way to reduce or streamline this timeline?
 - c. GMP has removed 5.508(C), which authorizes VELCO to prescribe a specific data format for interconnection queue data. GMP is requested to be prepared to discuss the rationale for this proposal.
 - d. Given that Transmission Owners are required to review and report to on certain DER (e.g., greater than 1 MW or those participating in the wholesale markets) connecting to the ISO-NE system, does the draft language provided by the Commission, as modified by GMP, allow VELCO to meet its obligations to ISO-NE?¹
7. In 5.510 on page 12, if a more simplified process is appropriate for systems up to 150 kW, please be prepared to discuss the following topics for that system:
 - a. Appropriate timelines.
 - b. Appropriate fees.

¹ VELCO describes ISO-NE's notification and study requirements in its comments dated July 30, 2021.

- c. What review standard, screening criteria, or hosting capacity analyses would be necessary.
8. Section 5.513(J) on page 19, GMP proposes that Interconnecting Utilities must notify “Affected Systems” within five business days if the Feasibility Study shows potential impacts on the transmission system or a Non-Jurisdictional Affected Utility. What rules, timelines, and processes apply to studies conducted by Affected Systems? Does the Commission have sufficient legal authority to order an “Non-Jurisdictional Affected Utility” to comply with the provisions of Rule 5.500?

Questions pertaining to the draft forms included as an appendix to this order:

10. Attached to this Order are draft model interconnection application forms for distributed energy resources with a capacity of up to 150 kW and systems greater than 150 kW. Stakeholders are requested to review these forms to ensure that they collect all necessary information.
11. The Commission has previously requested feedback about whether it is appropriate to require systems 150 kW and smaller to execute an interconnection agreement. The draft model interconnection application for systems up to 150 kW would serve as both an application form and an interconnection agreement. The draft form contains standard interconnection terms that are based on the IREC model form. Stakeholders are requested to review the draft interconnection agreement terms and comment on whether these terms are appropriate.
12. The IREC model interconnection application forms call for the submission of load flow data sheets. The Commission’s rules do not address the need for load flow data sheets. Do Vermont utilities need load flow data sheets to be submitted with an interconnection application?
14. Vermont’s current standard interconnection application form² requests information about wind turbine blade diameter and blade height. Is this data necessary for an interconnection review?

SO ORDERED.

² <https://puc.vermont.gov/document/commission-rule-5500-interconnection-application-form>.

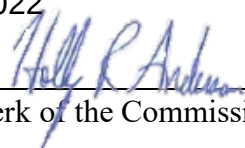
Dated at Montpelier, Vermont, this 3rd day of June, 2022.



Jake Marren, Hearing Officer

OFFICE OF THE CLERK

Filed: June 3, 2022

Attest: 
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

DRAFT Model Application and Interconnection Agreement for Distributed Energy Resources Not Greater than 150 kW

This form should be made available in an electronically fillable format and it shall be permissible to submit the form with electronic signatures.

Preamble and Instructions:

An owner of a distributed energy resource who requests interconnection to a State-regulated distribution or transmission facility must submit an application to the Interconnecting Utility. An application is accepted as complete when it provides all applicable information required. There is an Application fee that must be submitted to the Interconnecting Utility along with the Application. Consult the Interconnecting Utility to determine the amount of the fee required.

Applicant:

Name: _____

Address: _____

City: State, Zip: _____

Telephone (Day): _____ (Alternate): _____

Email Address: _____

Utility Customer Number (if applicable): _____

Electricity Provider (if different from Utility): _____

Representative: (if different from Applicant)

Name: _____

Address: _____

City, State, Zip: _____

Telephone (Day): _____ (Evening): _____

Email Address: _____

Project Specifications:

All power ratings should be listed in AC throughout.

Location (if different from above): _____

Project Owner (include percent ownership by any electric utility): _____

Applicant Load: (kW) _____ (if none, so state)

Typical Reactive Load (if known): _____

Total number and type of generators to be interconnected pursuant to this Application: _____

Total number of inverters to be interconnected pursuant to this Application: _____

Total Aggregate Nameplate Rating for all Generators: (kW) _____ (kVA) _____
Generating Capacity¹: (kW) _____ (kVA) _____

Limited-Export / Non-Export / Limited-Import Data:

If multiple export control systems are used, provide for each control system and use additional sheets if needed.

Is export controlled to less than the Total Aggregate Nameplate Rating? Yes: _____ No: _____

Method of export limitation: Power Control System / Reverse Power Protection / Minimum Power Protection / Other (describe): _____

Export controls are applied to how many generators? Multiple: _____ One: _____

If Power Control System is used, open loop response time: _____ (s)

Power Control System output limit setting: (kW) _____ (kVA) _____

Energy Storage System Power Control System operating mode:

Unrestricted: _____ Export Only: _____ Import Only: _____ No Exchange: _____

Describe which Generators the export control system controls: _____

Individual Generator Data:

Provide for each Generator, use additional sheets if needed.

Generator Technology: Photovoltaic / Turbine/ Fuel Cell / Energy Storage/ Other (describe): _____

Generator² Manufacturer, Model Name & Number: _____

Version Number: _____

Energy Source: Solar / Wind / Hydro / Other (describe): _____

If Energy Storage, usable capacity at maximum discharge rate: _____ (kWh)

Individual Inverter Data (if any):

Provide for each inverter, use additional sheets if needed.

Inverter Manufacturer: _____

Model Name & Number: _____

¹ As limited by any export controls.

² E.g. the solar PV module manufacturer, battery manufacturer, etc.

Version Number: _____

Nameplate Rating: (kW) (kVA) (AC Volts): _____

Rated Power Factor: (Underexcited) _____ (Overexcited) _____

Minimum Power Factor: (Underexcited) _____ (Overexcited) _____

Single phase: _____ Three phase: _____ (check one)

List of adjustable set points for the protective equipment or software: _____

Do export controls apply to this inverter? Yes: _____ No: _____

Single Phase: _____ Three Phase: _____ (check one)

Max design fault contribution current (choose one): Instantaneous: _____ RMS: _____

Is the inverter UL1741 Listed? Yes: _____ No: _____

If Yes, attach evidence of UL1741 listing.

Applicant Signature (may be electronic)

I designate the individual or company listed as my Representative to serve as my agent for the purpose of coordinating with the Utility on my behalf through the interconnection process.

INITIAL: _____

I hereby certify that, to the best of my knowledge, the information provided in this Application is true. I agree to abide by the terms and conditions of the Interconnection Agreement, provided on the following pages.

Signed: _____

Title: _____

Date: _____

Operation is contingent on Utility approval to interconnect the Project and receipt of all other required regulatory approvals.

Utility Signature (may be electronic)

Interconnection of the Project is approved contingent upon the terms and conditions of the Interconnection Agreement, provided on the following pages (“Agreement”).

Utility Signature: _____

Title: _____ Application ID number: _____

Date: _____

Utility waives inspection? Yes _____ No _____

Model Terms and Conditions of Interconnection Agreement for Distributed Energy Resources 150 kW or less

1.0 Construction of the Project

After the Utility executes the Interconnection Agreement by signing the Applicant's Application, the Applicant may not commence site preparation or construct the Project until it has obtained a Certificate of Public Good from the Public Utility Commission.

2.0 Interconnection and Operation

The Applicant may operate the Project and interconnect with the Utility's Electric Delivery System once all of the following have occurred:

- 2.1. The Project has been inspected and approved by the appropriate local electrical wiring inspector with jurisdiction, and the Applicant has sent documentation of the approval to the Utility; and
 - 2.2. The Utility has either:
 - 2.2.1 Inspected the Project and has not found that the Project fails to comply with an applicable technical screen or a UL or IEEE standard; or
 - 2.2.2 Waived its right to inspect the Project by not scheduling an inspection in the allotted time;
- or
Explicitly waived the right to inspect the Project.

3.0 Safe Operations and Maintenance

The Interconnection Customer shall be fully responsible to operate, maintain, and repair the Project as required to ensure that it complies at all times with IEEE Std 1547™.

4.0 Access

The Utility shall have access to the metering equipment of the Project at all times. The Utility shall provide reasonable notice to the Interconnection Customer when possible prior to using its right of access.

5.0 Disconnection

The Utility may temporarily disconnect the Project upon the following conditions:

- 5.1. For scheduled outages upon reasonable notice.
- 5.2. For unscheduled outages or emergency conditions.
- 5.3. If the Project does not operate in the manner consistent with these terms and conditions of the Agreement.
- 5.4. The Utility shall inform the Interconnection Customer in advance of any scheduled disconnection, or as soon as possible after an unscheduled disconnection.

6.0 Indemnification

Each Party shall at all times indemnify, defend, and hold the other Party harmless from any and all damages, losses, claims, including claims and actions relating to injury to or death of any person or damage to property, demand, suits, recoveries, costs and expenses, court costs, attorney fees, and all other obligations by or to third parties, arising out of or resulting from the indemnified Party's action or inactions of its obligations under this Agreement on behalf of the indemnifying Party, except in cases of gross negligence or intentional wrongdoing by the indemnified Party.

7.0 Insurance

The Interconnection Customer is not required to provide general liability insurance coverage as part of this Agreement, or through any other Utility requirement.

8.0 Limitation of Liability

Each Party's liability to the other Party for any loss, cost, claim, injury, liability, or expense, including reasonable attorney's fees, relating to or arising from any act or omission in its performance of this Agreement, shall be limited to the amount of direct damage actually incurred. In no event shall either Party be liable to the other Party for any indirect, incidental, special, consequential, or punitive damages of any kind whatsoever, except as allowed under paragraph 6.0.

9.0 Termination

9.1. This Agreement may be terminated under the following conditions:

9.1.1 By the Interconnection Customer: By providing written notice to the Utility.

9.1.2 By the Utility: If the Project fails to operate for any consecutive 12- month period or the Interconnection Customer fails to remedy a violation of these terms and conditions of the Agreement.

9.2. Permanent Disconnection: In the event the Agreement is terminated, the Utility shall have the right to disconnect its facilities or direct the Interconnection Customer to disconnect its Project.

9.3. Survival Rights: This Agreement shall continue in effect after termination to the extent necessary to allow or require either Party to fulfill rights or obligations that arose under the Agreement.

10.0 Assignment

For a Project offsetting part or all of the load of a utility customer at a given site, that customer is the Interconnection Customer and that customer may assign its Interconnection Agreement to a subsequent occupant of the site. For a Project providing energy directly to a Utility, the Interconnection Customer is the owner of the Project and may assign its Interconnection Agreement to a subsequent owner of the Project. Assignment is only effective after the assignee provides written notice of the assignment to the Utility and agrees to accept the Interconnection Customer's responsibilities under the Interconnection Agreement.

Application and Interconnection Agreement for Distributed Energy Resources Greater than 150 kW

This form should be made available in an electronically fillable format and it shall be permissible to submit the form with electronic signatures.

An Application is complete when it provides all applicable information required below and any required Application fee. A one-line diagram and a load flow data sheet must be supplied with this Application. Additional information to evaluate a request for interconnection may be required after an Application is deemed complete, however the Utility shall endeavor to identify data needs upfront rather than repeatedly asking for additional information.

Written Applications should be submitted by mail or e-mail to:

Utility: _____

Address: _____

E-Mail Address: _____

Utility Contact Name: _____

Utility Contact Title: _____

1. Applicant Information

Legal Name of Applicant (if an individual, individual's full name)

Name: _____

Address: _____

City, State, Zip: _____

Telephone (Day): _____ (Evening): _____

E-Mail Address: _____

Representative (if different)

Name: _____

Address: _____

City, State, Zip: _____

Telephone (Day): _____ (Evening): _____

E-Mail Address: _____

Type of interconnection (choose one): _____ Net Metering
_____ Load Response (no export)
_____ Wholesale Provider

Utility Account Number (for Generating Facilities at Utility customer locations): _____

2. Project Specifications

All power ratings should be listed in AC throughout.

Location (if different from above): _____

Project Owner (include percent ownership by any electric utility): _____

Applicant Load: (kW) _____ (if none, so state)

Typical Reactive Load (if known): _____

Total number and type of generators to be interconnected pursuant to this Application: _____

Total number of inverters to be interconnected pursuant to this Application: _____

Total Aggregate Nameplate Rating for all Generators: (kW) _____ (kVA) _____

Generating Capacity²: (kW) _____ (kVA) _____

(a) Limited-Export / Non-Export / Limited-Import Data:

If multiple export control systems are used, provide for each control system and use additional sheets if needed.

Is export controlled to less than the Total Aggregate Nameplate Rating? Yes: _____ No: _____

Method of export limitation: Power Control System / Reverse Power Protection / Minimum Power Protection / Other (describe): _____

Export controls are applied to how many generators? Multiple: _____ One: _____

If Power Control System is used, open loop response time: _____ (s)

¹ If the Utility requires the customer's name on the application to match the customer on the bill this should be specified on the application.

² As limited by any export controls.

Power Control System output limit setting: (kW) _____ (kVA) _____

Energy Storage System Power Control System operating mode:

Unrestricted: _____ Export Only: _____ Import Only: _____ No Exchange: _____

If relay is used to limit export, list relevant relay setpoints: _____

Describe which Generators the export control system controls: _____

(b) Individual Generator Data:

Provide for each Generator, use additional sheets if needed.

Generator Technology: Photovoltaic / Turbine/ Fuel Cell / Energy Storage/ Other (describe): _____

Generator³ Manufacturer, Model Name & Number: _____

Version Number: _____

Generator Nameplate Rating: _____

Energy Source: Solar / Wind / Hydro / Other (describe): _____

If Energy Storage, usable capacity at maximum discharge rate: _____ (kWh)

(c) Individual Inverter Data (if any):

Provide for each inverter, use additional sheets if needed.

Inverter Manufacturer: _____

Model Name & Number: _____

Version Number: _____

Nameplate Rating: (kW) (kVA) (AC Volts): _____

Rated Power Factor: (Underexcited) _____ (Overexcited) _____

Minimum Power Factor: (Underexcited) _____ (Overexcited) _____

Do export controls apply to this inverter? Yes: _____ No: _____

Single phase: _____ Three phase: _____ (check one)

List of adjustable set points for the protective equipment or software: _____

³ E.g. the solar PV module manufacturer, battery manufacturer, etc. The inverter information is provided below.

Single Phase: _____ Three Phase: _____ (check one)

Max design fault contribution current (choose one): Instantaneous: _____ RMS: _____

Is the inverter UL1741 Listed? Yes: _____ No: _____

If Yes, attach evidence of UL1741 listing.

(d) Rotating Machines (of any type)

Manufacturer, Model Name & Number: _____

Version Number: _____

Nameplate Output Power Rating: (kW) _____ (kVA) _____

Rated Power Factor: (Underexcited) _____ (Overexcited) _____

Minimum Power Factor: (Underexcited) _____ (Overexcited) _____

Single phase: _____ Three phase: _____ (check one)

List of adjustable set points for the protective equipment or software: _____

Do export controls apply to this machine? Yes: _____ No: _____

RPM Frequency: _____

Neutral Grounding Resistor (If Applicable): _____

List components of the Interconnection Equipment Package that are UL or IEEE Certified:

Equipment Type	Certifying Entity
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____

Is the prime mover compatible with the Interconnection Equipment Package? ____ Yes ____ No

(e) Synchronous Generators

Direct Axis Synchronous Reactance, X_d : _____ P.U.

Direct Axis Transient Reactance, X'_d : _____ P.U.

Direct Axis Subtransient Reactance, X''_d : _____ P.U.

Negative Sequence Reactance, X_2 : _____ P.U.

Zero Sequence Reactance, X_0 : _____ P.U.

KVA Base: _____

Field Volts: _____

Field Amperes: _____

For synchronous generators, provide appropriate IEEE model block diagram of excitation system, governor system and power system stabilizer (PSS) in accordance with the regional reliability council criteria. A PSS may be determined to be required by applicable studies. A copy of the manufacturer's block diagram may not be substituted.

(f) Induction Generators

Motoring Power (kW): _____

I^2_t or K (Heating Time Constant): _____

Rotor Resistance, R_r : _____ Rotor Reactance, X_r : _____

Stator Resistance, R_s : _____ Stator Reactance, X_s : _____

Magnetizing Reactance, X_m : _____

Short Circuit Reactance, X_d : _____

Exciting Current: _____

Temperature Rise: _____

Frame Size: _____

Design Letter: _____

Reactive Power Required In Vars (No Load): _____

Reactive Power Required In Vars (Full Load): _____

Total Rotating Inertia, H: _____ Per Unit on kVA Base

3. Transformer and Protective Relay Specifications

Will a transformer be used between the generator and the Point of Common Coupling?

_____ Yes _____ No

Will the transformer be provided by the Interconnection Customer? _____ Yes _____ No

(a) Transformer Data: (if applicable, for Interconnection Customer-Owned Transformer)

Is the transformer: _____ single phase _____ three phase (check one) Size: _____ kVA

Transformer Impedance: _____ percent on _____ kVA Base

If Three Phase:

Transformer Primary: _____ Volts _____ Delta _____ Wye _____ Wye Grounded
Transformer Secondary: _____ Volts _____ Delta _____ Wye _____ Wye Grounded
Transformer Tertiary: _____ Volts _____ Delta _____ Wye _____ Wye Grounded

(b) Transformer Fuse Data: (if applicable, for Interconnection Customer-Owned Fuse)

(Enclose/Attach copy of fuse manufacturer's Minimum Melt and Total Clearing Time-Current Curves)

Manufacturer: _____ Type: _____ Size: _____ Speed: _____

(c) Interconnecting Circuit Breaker: (if applicable)

Manufacturer: _____ Type: _____

Load Rating (Amps): _____ Interrupting Rating (Amps): _____ Trip Speed (Cycles): _____

(d) Interconnection Protective Relays: (if applicable)

If Microprocessor-Controlled:

List of Functions and Adjustable Setpoints for the protective equipment or software:

	Setpoint Function	Minimum	Maximum
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____

(e) Discrete Components: (if applicable)

(Enclose/Attach Copy of any Proposed Time-Overcurrent Coordination Curves)

Manufacturer: _____ Type: _____ Style/Catalog No.: _____

Proposed Setting: _____

Manufacturer: _____ Type: _____ Style/Catalog No.: _____

Proposed Setting: _____

Manufacturer: _____ Type: _____ Style/Catalog No.: _____

Proposed Setting: _____

(f) Current Transformer Data: (if applicable)

(Enclose/Attach Copy of Manufacturer's Excitation and Ratio Correction Curves)

Manufacturer: _____

Type: _____ Accuracy Class: _____ Proposed Ratio Connection: _____

(g) Potential Transformer Data: (if applicable)

Manufacturer: _____

Type: _____ Accuracy Class: _____ Proposed Ratio Connection: _____

4. General Information

Enclose/Attach copy of site electrical one-line diagram showing the configuration of all Project equipment, current and potential circuits, and protection and control schemes.⁴ This one-line diagram must be signed and stamped by a licensed Professional Engineer if the Project is larger than 150 kW.

Is one-line diagram enclosed? _____ Yes _____ No

Enclose/Attach copy of any site documentation that indicates the precise physical location of the proposed Project and all protective equipment (e.g., USGS topographic map or other diagram or documentation).

Is site documentation enclosed? _____ Yes _____ No

Enclose/Attach copy of any site documentation that describes and details the operation of the protection and control schemes.

Is available documentation enclosed? _____ Yes _____ No

Enclose/Attach copies of schematic drawings for all protection and control circuits, relay current circuits, relay potential circuits, and alarm/monitoring circuits (if applicable).

Are schematic drawings enclosed? _____ Yes _____ No

5. Applicant Signature (may be electronic)

I designate the individual or company listed as my Representative to serve as my agent for the purpose of coordinating with the Utility on my behalf through the interconnection process.
INITIAL: _____

I hereby certify that, to the best of my knowledge, all the information provided in this Interconnection Application is true and correct. I also agree to install a warning label provided by (utility) on or near my service meter location. Generating Facilities must be compliant with IEEE, NEC, ANSI, and UL standards, where applicable. By signing below, the Applicant also

⁴ Some states require or encourage utilities to publish sample one-line diagrams that illustrate the expectations for format and detail. Such supporting materials can help the customer and the utility by reducing the number of applications that are deemed incomplete on the first try.

certifies that the installed generating equipment meets the appropriate preceding requirement(s) and can supply documentation that confirms compliance.

Signature of Applicant: _____

Date: _____

PUC Case No. 19-0856-RULE - SERVICE LIST

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