

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 22-3947-TF

Tariff filing of City of Burlington Electric Department to revise its net- metering tariff effective October 1, 2022	
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**DEPARTMENT OF PUBLIC SERVICE COMMENTS REGARDING THE
SUPPLEMENTAL NET-METERING TARIFF FILINGS OF THE CITY OF
BURLINGTON ELECTRIC DEPARTMENT**

On September 2, 2022, the City of Burlington Electric Department (“BED”) filed proposed revisions to its net-metering tariff with the Vermont Public Utility Commission (“Commission”). BED’s proposed effective date is October 1, 2022, and the revised tariff predominantly reverts BED’s net-metering 1.1 solar incentive (i.e. for preexisting systems) to its value before Case No. 21-2186-TF.¹

On September 9, 2022, the Commission asked BED a series of information requests to explain whether (and why) a waiver of the 45-day notice is sought, providing customer notice and an explanation of customer impacts, updating the redline to discount changes already effective September 1, 2022,² and to clarify the reasoning and context for these proposed changes. In response, BED submitted a revised tariff, another cover letter, a proposed customer notice, and explanatory testimony on September 16, 2022.

The Vermont Department of Public Service (“Department”) filed a recommendation that the Commission accept these changes on September 16, 2022. Subsequently, the Department has reviewed BED’s supplemental filings of

¹ It bears noting that BED’s net-metering tariff was recently updated to reflect the most recent Rule 5.128 biennial update (*In re: biennial update of the net-metering program*, Case No. 22-3304-INV, Order of 06/17/2022), as approved in Case No. 22-2768-TF, on August 26, 2022, and that updated tariff became effective on September 1, 2022.

² Per Case No. 22-2768-TF.

September 16, 2022, and hereby reaffirms its recommendation³ that the Commission accept BED's tariff changes.

However, the Department maintains that BED's proposed customer notice⁴ is somewhat unclear. Moreover, the Department asserts that the proposed notice (among other documents filed by BED) does not accurately reflect the record and the Department's recommendations in Case No. 21-2186-TF. As such, the Department has contacted BED concerning this and submits a proposed redline of BED's proposed customer notice herewith, in hopes of correcting these issues.

Thank you for your consideration, please do not hesitate to contact me with questions or concerns.

Dated in Montpelier, Vermont on this 23rd day of September 2022.

Sincerely,

/s/ Alex Wing
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cc: ePUC Service List

³ This tariff revision will enable BED to bring its billing practices into compliance with 30 V.S.A. § 219(a)(h)(1)(K)(v) (2015), which requires that "[a] solar net-metering system *shall receive the amount of the credit* under this subdivision (K) that is in effect for the service territory in which the system is installed *as of the date of the system's installation and shall continue to receive that amount* for not less than 10 years after that date *regardless of any subsequent modification to the credit* as contained in the electric company's rate schedules." 30 V.S.A. § 219a(h)(1)(K)(v) (2015) (emphasis added).

⁴ Exhibit JLG-1.