Comments and Questions on WEC rate increase tariff, case number 22-4100-TF. Comments based on documents filed with PUC on September 16, 2022

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General Comments and Questions:

1. In WECs September 2022 issue of Co-op Currents, published just before the rate increase tariff was filed, WEC stated the following: on page 1, "higher electricity rates are also likely to slow our members' adoption of technologies such as electric vehicles and electric heat pumps, which are important to Vermont's Comprehensive Energy Plan and the states' effort to combat climate change"; and on page 7 "you can't shift people away from fossil fuels when electricity is expensive" (Barry Bernstein, former Board of Directors President). WEC also dismissed net metering, saying on page 3 "In WECs opinion, net metering is not a sustainable long term model for decarbonizing everyone's use of energy." The high rates WEC is talking about are before the 14.19% rate increase was filed. WEC acknowledges that high electric rates hinder additional beneficial electrification just before applying for a 14.19% rate increase. They also dismiss net metering, which may actually be helping to reduce greenhouse gas emissions if members can use some of their own power production to energize heat pumps and EV chargers. The PUC should review this situation carefully and determine if WEC can receive guidance to help them reduce their costs and become more efficient to reverse this trend.
2. All of the pre-filed direct testimony documents filed on 9/16/2022 reference the case number as 22-****-TF. Does this mean they are draft documents or are these considered final?
3. The pre-filed testimony of Shawn Enterline on behalf of Washington Electric Cooperative shows a rate increase of 14.08% on each individual page header versus 14.19% rate increase on the cover page. This leads to confusion over which number is right. Mr. Enterline appears to be a major consultant for WEC so why does his testimony references a 14.08% rate increase versus the 14.19% pre-filed by WEC personnel. A 14.08% rate increase would decrease the customer charge to $30.22, the low tier rate to $0.09669/kWh and the high tier rate to $0.24127/kWh. Using the same calculation as used on the notice of proposed tariff changes (Exhibit WEC 3A) the monthly rate would become $136.40, a reduction of $0.13/month or $1.56/year/member for a total reduction of about $18,720 over 12,000 members.
4. The customer charge will increase from $26.49 to $30.25/member/month. What percentage of WECs' fixed costs does this cover and how does that compare to other utilities in Vermont. What is the average and median for other Vermont utilities?

Comment and Questions on Shawn Enterline Prefiled Testimony

1. Q7 and A7. Mr. Enterline's Answer to Q7, on lines 11 and 12 is "In WECs' case, the imbalance is seasonal. During the winter months, WEC's supply is less than its demand, and the reverse is true in the summer months". Is this shortage of supply in the winter due to WECs' power supply mix (i.e. does Coventry, Wrightsville, etc. produce less in the winter) or is it due to other factors. What can be done to insure WEC has adequate and affordable winter supply especially considering WEC members are apparently not transitioning away from fossil fuels because electricity prices are too high.
2. Q9 and A9, p 4 of 13. This appears to be in reference to the cost to purchase lower quality RECs to "green" back up WECs' portfolio after the sale of the environmental attributes (RECs) from

their own power resources. It's confusing to show REC costs this way for the test and rate year since this appears to be the net REC revenue. WEC-1, S2, should have separate lines for volume and REC gross sales revenue, REC purchase cost, and REC net revenue for the test year and rate year. This will allow WEC members and others to easily see the impact of the sale of high quality RECs less the purchase of lower quality RECs and WECs' net REC revenue as a result. Also, see Comments and Questions pertaining to RECs, Exhibit WEC-SPE-9 below.

3. Q13 and A13, pages 5 of 13 and 6 of 13. Note that it is stated the cost of the Coventry Landfill decreases by $4,397,951 while generation was adjusted upward to 50,561 MWH/year (1658 MWH over test year). It is also stated that the price of the contract was held constant at $38.15/MWH (line1, p6 of 13). However if the contract is held constant at $38.14/MWH the cost decrease would be $1,928,902, which is the energy cost shown on WEC SPE-1 in the column rate year energy cost ($) for Coventry. A cost decrease of $4,397,951 over 50,561 MWH would be a price of about $86.98/MWH, greater than a 2X increase. On WEC-1 Schedule 2 note that the Pro Forma Adjustment of 1658 mWh and a cost adjustment of $2,634,247 equates to an mWh value of about $1588. It seems like the Pro Forma Adjustment should be closer to $165,198 to hold the contract value of $38.14/MWH. This would also bring the adjusted rate year value on Schedule 2 up to $1,928,902, consistent with what is shown on WEC SPE-1.

Comments pertaining to Net Metering (Exhibit WEC-1 Schedule 16, and others)

1. The power generated from net meter systems (distributed generation) has been labeled as redundant and wasteful by WEC leadership (Co-op Currents September 2022). Why? Are other Vermont utilities wasting distributed generation and are they generating redundant power while net meter systems are producing "behind the meter". The ISO NE grid compensates for estimated "behind the meter" generation every day and adjusts load demand accordingly. Is WEC not capable of doing the same? Does this warrant an investigated by PUC as part of this rate increase since net meter generation is playing a larger role in WECs' power supply every year. If this power is being wasted by WEC and redundant power is being produced by WEC, larger than necessary rate increases most likely are resulting.
2. Power produced from net meter systems should be referred to as "behind the meter" power, consistent with ISO NE, or as distributed generation, (WECs sister co-op VEC refers to net meter power as distributed generation). This power is directly fed to the distribution system while reducing load demand from generation plants and the transmission system.
3. GM Louis Porter (pre-filed testimony, pages 3 and 4 of 7, Q7 and A7) stated that WEC plans to account for the impact of net metering as a power supply cost, rather than as decreased revenue. WEC believes this will give a clearer picture of the relative energy costs (and credits) of net metering power and place it properly as a power supply expense. Instead of delaying this accounting to the future, it should be done as part of this rate increase tariff case. All the information is available and this should be a fairly simply accounting change. It could easily be shown on schedules S1, S1-A, and S2 of Exhibit WEC-1. WEC membership should have this transparency and distributed generation should be accounted for what it is: a part of WECs' power supply resource portfolio.
4. Net metering power (distributed generation) should also show on WECs' power supply pie charts and other generation tables since it is part of their power supply portfolio. The

membership should know what percentage of WEC power comes from distributed generation and how it compares to WECs' other power sources, both pre and post REC sales.

5. What is meant by "erosion of load" (line 2, p 4 of 7, LP testimony). Is this a utility term? Is erosion of load as used here positive since distributed generation leads to a positive decrease in long distance power generation demand and transmission demand (load) since demand is being generated locally, or is this a negative connotation and if so for what reason?
6. The following comments pertain to Exhibit WEC-1, SCHEDULE 16 net metering, in addition to schedules S1, S1-A, and S2 as noted
    a. Schedule 16: The total kWh adjustment to RATE YEAR (cell L32) of 1,097,120 appears reasonable based on a capacity factor of 0.13.
    b. Schedule 16: Why is an avoided retail rate of $0.24034/kWh (cell L33) used? For the rate year, a blended kWh rate of 0.21256 is found in the Notice of Proposed Tariff Changes (Exhibit WEC 3A) based on a residential member using an average 500 kWh per month. However, a fairer way to calculate the blended residential rate is by the procedure found in PUC 5.100, PUC Rules Pertaining to Net Metering Systems, section 5.127 Determination of Applicable Rates and Adjusters. Part 5.127 (A)(2) should be used to determine avoided retail rate for kWh actually "netted" while 5.127(A)(3) should be used to determine avoided retail rate for kWh subject to "excess generation credits". For the rate year, the excess generation credit rate is $0.17141/kWh as established in the PUC 2022 biennial update. This rate will be in effect for the entire rate year. The rates and the kWh each apply to are readily available for the test year since they show up on net metering statements every month. Since kW of commissioned net metering is the same in rate year as test year, the calculations should be straight forward. These rates applied to the appropriate net metering kWh would give a truer picture of what the "REDUCTION REV gross" (cell L34) is.
    c. Schedule 16: Why is the Monthly Customer Charge Revenue (cell L36) for the Rate year only $22.25/month/member. Clearly, for the rate year the customer charge will be $30.25 according to the notice of proposed tariff changes (Exhibit WEC 3A). If the rate year customer charge is used for the rate year, the Monthly Customer Charge Revenue becomes $38,841, an increase of greater than $10,000 over what' shown.
    d. Schedule 16: The current and applicable Net Metering Tariff has a $-0.02/kWh penalty (charge) for <u>every</u> kWh produced by a net metering system. This penalty came into effective September 1, 2022 and by the PUC Rule 5.100 it is for perpetuity. This penalty is in in effect for the entire tariff rate year. A $-0.02/kWh charge on the 1,097,120 kWh produced from net meter systems installed during the rate year equals $21,942. This charge must be paid regardless of the NM credits in the account. This charge is not shown but should be in a separate cell below customer charge.
    e. Schedule 16: WEC charges $3.97/month/net meter member account management fee. This equals a yearly charge of $5,097 for the net meter customers shown. This charge must be paid regardless of the NM credits in the account. This charge is not shown but should be in a separate cell below customer charge and kWh production charge.
    f. Schedule 16: Net metering credits expire if not used in 12 months. For the rate year, the kW installed is new. It's not uncommon for new net metering systems to either overproduce or they are deliberately sized larger than needed due to the net meter owner planning to increase future power consumption by installing heat pumps or an EV charger. This can lead

to excess generation credits being expired. In essence the expired credits represent revenue to WEC, because the power was produced and sold by WEC but the net meter owner never got to use the credits. The expired net metering credits should be accounted for as another charge against revenue. Since installed kW is the same for the rate year as existing kW in the test year, the amount of expired net metering credits in the rate year should be easy to estimate.

g. Schedule 16: There is no accounting for <u>any</u> benefit derived from the transfer of RECs from net meter systems to WEC. Most likely a vast majority of the net meter members transfer their RECs to WEC. As a result the net meter member cannot claim renewable power is being produced from their system, but WEC gets the RECs and must retire them. This distributed generation becomes part of WECs 100% renewable energy portfolio, and it may actually make up a significant percentage of the renewable power produced in state due to the sale of RECs from other WEC generation facilities. Also, there is no monetary benefit shown to WEC from over 1000 MW of RECs being transferred to WEC from net meter members in the rate year. Since the distributed generation from net meter systems will be shown as a power supply in WECs' portfolio, can't an additional 1000 MW of RECs from one of WECs' other generating plants be sold and the additional power from that plant also be sold since WEC claims the distributed generation in their service area is redundant power? The additional 1000 MW of REC sales could represent over $30,000 in additional revenue from net metering systems.
h. Schedule 16: Net meter systems are often used by the member owner to offset electricity used by heat pumps (hot water or air to air) or by EV chargers, and to a lesser extent to charge battery powered lawn equipment. WEC members that use the power from their net meter systems for these purposes are helping WEC meet their tier III requirement and avoid future penalties, so if there is any benefit it should be shown.
i. Does Schedule 16 take into account any savings from transmission costs and power purchase costs from other generators, especially since net metering systems are known to reduce the load demand of most distribution utilities especially during summer peaks.
j. WEC claims in their Co-op Current newsletters that power produced by distributed generation is redundant and wastes resources, and has little additional environmental value. Yet the test year data on Schedule 2 shows a significant decrease in power production from both the Coventry plant due to landfill issues and from the Wrightsville plant and the purchase of "ON Peak Market Purchase" of 1984 mWh. Does this mean that the power produced by distributed generation in the WEC service area was not used to offset some if not all of this decrease, but instead WEC purchased power from some other source? Why would this occur when the distributed power is locally available and an estimate of this generation is available every day from the ISO NE grid. Ratepayers should not be subject to that part of rate increases if distributed generation is not being properly utilized by WEC.
k. WEC claimed in their recent newsletter published before this tariff increase was filed that net metering would be a "major driver in rate increase" and that close to a million dollars will be cost-shifted this year. However, Exhibit WEC 3A Notice of Proposed Tariff Changes does not mention net metering and worksheets S1, S1-A, and S2 of Exhibit WEC-1, do not show this. S1 shows no "LOSS OF LOAD/NET METER" for the test year and only $235,114 for

the rate year (which should be lower if the comments above are addressed). This is a far cry from a $1,000,000 cost shift. In fact, S1-A shows "Loss of Load/Net Meter" causing the need for only a 1.40% rate increase over a total of 14.19%. The 1.40% should be lower if the comments above are addressed. If this "Loss of Load/Net Meter" was shown on sheet S2-Power Supply as distributed generation, where GM Porter says it will be, the cost the power would be included with the other resources shown. It would then be shown on S1 and S1-A as "PURCHASED POWER" and "Change in Purchased Power" where it rightly belongs.

l. If the items discussed above are accounted for the Net Effect shown in cell L38 of Schedule 16 should be less, LOSS OF LOAD/NET METERING on S1 will be less, Loss of Load/Net Meter value and percent will be less, and S2 will include the appropriate amount for power supply from distributed generation where it belongs.

m. A thorough analysis of test year to rate year for net metering should be performed, based on the assumption as shown that the same amount of kW will be commissioned in the rate year as the test year. WECs' net metering rate tariff has changed due to the PUC 2022 biennial update (Case no. 22-0334-INV), applicable to the rate year. If the proper rates are used for the test year versus the rate year, it should show that the cost of power supplied by net metering in the rate year has decreased, perhaps making it more economical than power from other WEC sources.

Comments and Questions pertaining to RECS, Exhibit WEC-SPE-9

1. Exhibit WEC SPE-9 is confusing and difficult to figure out exactly what's going on. For transparency, it should be clearly shown how many environmental attributes from each WEC resource are being sold in the form of RECs. Once those environmental attributes are sold, WEC can no longer claim that power as renewable, just as power.
2. The lower part of Exhibit WEC-SPE-9 appears to show that 50,000 MWH of environmental attributes (RECs) of the power produced in the rate year are already committed to be sold in the rate year while another 10,893 MWH of RECs will be sold sometime later, but in the rate year. This is a total of 60,893 MWH in the rate year from WEC power resources that cannot be claimed as renewable energy. It is 77% of their power supply shown on this table.
3. Since WEC claims to be 100% renewable power, and they imply that they supply that renewable power from their own sources, It's critical from a transparency standpoint that it is clear which part of WECs' portfolio, by resource, is no longer renewable due to the sale of RECs. This should be presented to the members clearly so they can see exactly where WEC gets its <u>renewable</u> power from.
4. From a transparency standpoint, WEC-SPE-9 should show who and where the RECs are purchased from and the cost associated with that to "green" their portfolio back up to "100% renewable power". Obviously this will reduce the Total REC Revenue to a Net REC Revenue but it will also allow members to see where their "renewable" power really comes from and what is costs to get there. Are the RECs purchased to replace those sold of a lesser quality and from from out of state?
5. WEC-SPE-9 should show as a resource the power supplied from distributed generating sources (net metering). Those numbers are readily available in Exhibit WEC-1 Schedule 16. There would be no RECs sale associated with this power supplied since by law WEC is required to retire any transferred RECs. It is, and always will be, 100% renewable power generated in Vermont.

6. A pie chart of WECs' power portfolio pre and post REC sales should be included with this tariff increase. The pie charts should include distributed generation so WEC members can see that the percentage of WECs' power portfolio that comes from distributed generation is significant and is 100% renewable power produced in state.
7. The portion of power supply that WEC purchases from GMP should be on this table and on the pie charts.

Comments and Questions on Schedule 2 Power Supply and Exhibit WEC SPE-1 Test Year Power Costs and Rate Adjustments

1. WEC SPE-1: The MWH entitlements are increasing just over 4000 MWH from the test year to the rate year. Both total MWH for the test year and rate are higher than any recent power sales figures shown in WEC annual reports via Co-op Currents. Why do these amounts reflect higher than recent WEC annual sales amount?
2. WEC SPE-1: In the Energy Costs section (columns F-I) the Energy Charges ($) and Energy Credits ($) are shown for the test year and rate year. The energy charges increase about 3.5% from test to rate year while the energy credits increase about 90% from test year to rate year. Why is this? Are the energy credits in the test year or rate year being adjusted somehow that is not clear?
3. WEC SPE-1 and Schedule 2 resources sections. The Resources section in WEC SPE-1 clearly shows Energy Charges and Energy Credits for each resource. Why aren't these energy credits for each resource shown as a gross revenue as calculated from WEC SPE-1 and the associated charges for each resource shown separately on Schedule 2, since according to WEC SPE-1 the resources energy costs account for a significant adjustment from test to rate year.
4. WEC SPE-1 shows $0 energy charge and energy credit for Wrightsville Hydro in the test year and $0 energy charge in the rate year even through there is a MWH entitlements of 1046 test year and 1446 rate year. Why?
5. WEC SPE-1 shows no energy charges or energy credits associated with the HQUS WEC-VEC Transfer for the test year and rate year. Why? Does WEC gain or lose any monetary value for this transfer that should be shown?
6. WEC SPE-1 should show Distributed Generation as a resource starting with this rate increase request. WEC members would then have a much clearer picture how distributed generation fits into WECs power resource portfolio, with associated MWH entitlements and all associated charges and credits.
7. WEC SPE-1 shows an adjustment in Energy Market charge of $5,053,010 from test year to rate year. The same amount appears to show on Schedule 2 as Load Energy Charges (Vermont Zone). What is this charge and why is there such a significant increase from test to rate year?
8. Schedule 2, line 1 (Resources). Where do the test year and adjusted rate year $ come from? It appears that the test year comes from a kWh cost of $0.12147 times 73,823,000 kWh while the rate year comes from a kWh cost of $0.18136 time 77,881,000 kWh. Why is the adjusted rate year kWh cost about 50% higher that the test year?
9. Schedule 2, line 2: 1984 mWh of "On Peak Market Purchase" is noted at a charge of $94,434. WEC has a significant amount of distributed generation in their service area. Was distributed generation used to offset this charge?

10. Schedule 2, Line 7: There is no energy charge/credit for the test year for 1046 mWh from the Wrightsville plant for the test year. Why not? The Pro Forma Adjustment shows 400 mWh and a credit of $181,832. This is $454.58/mWh of credit. Is this realistic?
11. Schedule 2, Line 8: The power supply credit per mWh from the Coventry Clean Energy Corp plant increases from $36.07/mWh in the test year to $86.98/mWh in the adjusted rate year. This appears to be about a 241% increase in one year. Why is the credit of $1,763,704 in the test year so much less than the adjusted rate year credit of $4,397,951 when the increase in power production at the plant is estimated at only 1658 mWh more?
12. Schedule 2, Line 10: the adjusted rate year shows a credit of $8,833 for 4896 mWh from the HQUS contract. Does this mean WEC is only receiving $1.80/mWh for Hydro Quebec power? What is WEC paying for the same power and would it be more economical to use distributed generation rather than Hydro Quebec?
13. Schedule 2, Resources Section: All power resources have a significant increase in credit for the adjusted rate year. Why? Is this realistic based on test year sales and purchases?
14. Schedule 2, Resources Section. Distributed generation mWh and charge/(credit) should be presented here. This would show how many mWh per year distributed generation is added to the power resources, the charge/(credit) from that power, and the assurance that that power is being used to benefit WEC membership.
15. Schedule 2, line 18. The Load Energy Charges (Vermont Zone) increases over $5 million for the adjusted rate year. This is one of the largest charge increase. What is this and why is the increase so drastic in one year?
16. Schedule 2, line 24. REC Purchases are shown as a charge, with the test year charge being $287,250 for 60,000 mWh of RECs ($4.79/mWh REC) while the adjusted rate year charge is $551,040 for 55,101 mWh ($10.00/mWh REC). Why is there a significant difference in this charge over 1 year?
17. Schedule 2, line 24. REC Purchases. The test year and adjusted rate year appear to be the cost to WEC to buying back renewable attributes to "green" up their portfolio to 100% renewable energy. However, There is no (credit) showing REC Sales. Exhibit WEC-SPE-9 Rate Year REC Volumes and Revenues shows test and rate year revenues from REC sales. Why aren't those used here to have a more complete calculation for REC revenues and costs. Note also that the REC purchase volume on line 24 rate year is 55,104 mWh while SPE 9 rate year shows the sale of 60,893 mWh during the rate year and test year sales of 58,953 mWh of RECs.
18. Schedule 2, line 56 Transmission Charges. The total of these charges for both the test year and adjusted rate year are significant (over $2 million each year) and the adjustment is about $3500. Is there any savings associated with distributed generation shown in these costs?

Comments and Questions Pertaining to Wec-1: Schedule 1, Schedule S1-A, Schedule 3, Schedule 17

1. Schedule 1, line 2, The line 2 transmission costs come from schedule 3, and seem to be more from WEC owned infrastructure. I recommended future Schedule 1 clarifies this so the total cost of transmission is shown on Schedule 1.
2. Schedule 1, Line 7 and Schedule S1-A, Line2 in Expense Items should be labeled WEC Power Production Costs to match Schedule 3. Schedule 3 labels these costs as WEC Power Production Costs when in reality they are primarily property taxes and some labor cost. The main driver in

the Pro Forma Adjustments comes from a significant (about 180%) increase in property tax for the Coventry Plant.

3. Schedule 1, Line 7 shows higher test year and adj rate year than that shown on Schedule 3, WEC Power Production Costs section. Schedule 3 rate year is $38,379 lower than Schedule 1, which means WEC is asking for $38,379 more for power production costs in the adj rate year than justified in Schedule 3.
4. Schedule 1, Lines 11 and 12. These refer to line 33. The amount on line 33 implies an increase of $209,290 for the adj rate year rate but schedule S1-A shows the revenue requirement increase of $20,160 for these items. Why aren't these adjustments shown in the Pro Forma Adjustment column and carried over to the adj rate year column like the other items for consistency?
5. Schedule 1, Line 24. Why is there no "loss of revenue/net meter" for the test year? Why isn't the appropriate amount shown in the Pro Forma Adjustment column?
6. Schedule 1, Line 25. This refers to the S17 tab. The "Revenue at Existing Rates" for the test year, $17,067,643, appears to be net of "loss of load/net meter" according to schedule 17. However, when adjusted for the adj rate year in schedule 1 an additional $235,114 is subtracted from the test year Revenue at existing rate for "loss of load/net meter". Why? According to schedule 17 the test year modified for phase-in (column Q) appears to be revenue at existing rates should be $17,057,293, net of net metering. Why is this reduced further on Line 25 Schedule 1?
7. Schedule 1, Line 25: The revenue shown comes from schedule 17. Schedule 17 uses significantly less kWh than shown on Schedule 2 for both test and adj rate year. Why the difference?
8. Schedule 1, Line26. Line 26 shows a deficit of $216,430 for the test year that ended June 30, 2022. There is no Pro Forma Adjustment for this item which implies the deficit has been paid. Was there not enough margin (shown in Line 29) to cover this debt?
9. Schedule 1, Line 26, Line 27 and Line 29. Line 27: Why does the test year on line 27 show the same deficit as line 26? Line 27: It appears this Pro Forma Adjustment of $1,365,911 from test year to rate year is for the tier 2 required amount for the adj rate year (line 29). Why does the deficit need to be covered again (it appears to be covered in line 26)? This is important because this one cost item accounts for 8.12% of the 14.19% increase requested.
10. Schedule S1-A: Schedule S1-A is the most important Schedule in the tariff filing because it is a summary of the proposed rate increase by dollars and percentages. However it is a hodge-podge of expense and revenue items that one must pull together from multiple other schedules, which often requires researching additional schedules. Is there some way this can be standardized so a ratepayer can clearly see where these required revenue increases are coming from?

Comments and Questions pertaining to Generation Plant Wrightsville Hydro

1. This plant is owned by WEC and due to significant decreases in power production during the test year it plays a significant part in the in tariff rates for the rate year.
2. Mr. Enterline's pre-filed testimony Q19 ana A19, page 8 of 13 states "The resulting adjustment equates to 2,492 MWH in the Rate Year, which is a 1,446 MWH increase from the Test Year (1,050 MWH)." From Schedule 2, the increase is only 400 MWH which equates

to 1446 MWH in the rate year. This points to the uncertainty of production from Wrightsville. How does this affect revenue?

3. Wrightsville can be negatively affected by inflows into the reservoir. A certain water level must be retained to satisfy the recreational and conservation pool levels, in additional to releasing minimum flows in the bypass zone between the dam and power plant (common for hydro plants that rely on an upstream reservoir). In drought or abnormally dry periods Wrightsville can be negatively impacted due to less water available to make power. On just about a daily basis extreme climate events are discussed. Are there formulas or studies available to determine a reasonable capacity factor for small hydro plants such as Wrightsville that may be impacted by climate change, instead of using "…a de minimis adjustment to match WEC's accounting records…" (Mr. Enterline's pre-filed testimony, Q19 A19 page 8 of 13).

Comments and Questions Pertaining to Generation Plant Coventry Clean Energy Corp

1. Constraint issues with the Sheffield Highgate Interface (outside the WEC service area) apparently came about after the plant was commissioned and after the fifth generator was installed in 2009. Has a capacity analysis been performed to see how much of an impact to the Coventry Plant is actually due to grid constraint versus other issues. It was noted in a previous Co-op Currents newsletter that 2020 was a record year for Coventry, well after constraint issues were identified. Is that the maximum power Coventry can be expected to produce in a year? How does that relate to maximum capacity and a potential loss in revenue?
2. The Coventry plant is touted as a major source of WECs 100% renewable portfolio. However, what percentage of WECs renewable portfolio is from Coventry after the sale of RECs?
3. There has been a major change to the waste stream since the Coventry plant came on line. Compostable organics from home and businesses are no longer allowed to be disposed in the landfill. This program is having success in Vermont, and will inevitably lead to reduced methane over the years. How is or will this affect power generation going forward? This is important for future rate increases since Coventry supplies the majority of WECs power.
4. Since Coventry supplies the majority of WECs power supply a relatively small loss in production capacity has a huge impact on WECs revenue and therefore rates. For example the adj rate year anticipates a production increase of about 3.3% over the test year (schedule 2). That small increase in production represents an additional $2,634,247 in revenue over the test year, according to Schedule 2, line 8. Since there have been issues with production at Coventry, is it prudent to assume there will be that much of an increase in production? If production stays low at Coventry, WEC ratepayers will be subject to future rate increases due to a continuing decline in power production from the Coventry plant.
5. Is it common for a small utility like WEC to have so much invested in one power generation plant (over 68% of the WECs power comes from Coventry according to their 2021 power supply graph)?