

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

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

GREEN MOUNTAIN POWER REPLY COMMENTS

Green Mountain Power Corporation (“GMP”) appreciates the opportunity to provide these limited comments in response to the Commission’s December 2, 2022 Order and the most recent draft changes to Rule 5.100. GMP looks forward to providing further comments to other filings received in response to the Commission’s draft rule during any additional steps in this proceeding.

Single Plant Information (Sections 5.106 and 5.107)

The Commission has proposed to require net-metering applicants to provide information about known existing or proposed facilities on the same parcel or a parcel adjacent to a proposed net-metering system, along with a site plan showing both facilities. GMP agrees that this information is appropriate because it will help the Commission, the utility, and the Department assess the proximity of the facilities and inform any same or separate plant determination and the appropriate compensation.

Amendments to Pending Registrations and Applications (Section 5.108)

The Commission proposes a standard that would make systems subject to the current rules for net-metering systems, including the most recent adjustor values and non-bypassable charges, if they increase their capacity by more than 5% or 10 kW, whichever is greater. Establishing specific thresholds to define the appropriate compensation for amended systems would be constructive and provide clarity to participating customers considering amending their systems and to the distribution utilities that implement compensation for net-metering systems. Though other thresholds appropriately could be chosen, the specific thresholds proposed by the Commission appear reasonable—supportive of net-metering system expansions that would complement customers’ electrification efforts, while avoiding potentially substantial cost shifts that could occur if net metering adjustors and terms set years ago based on past conditions were made available to much larger expansions.

GMP’s reading of the proposed language in Section 5.108(C) is that for proposed amendments to net-metering systems, all project output from both the original and expanded portions would receive the same adjustors and terms. For example, for project amendments larger than the percentage or size threshold above, the most recently adopted adjustors and non-bypassable charges applicable to new net-metering systems would apply to all output of the amended system, not only the additional capacity. This method offers clarity to stakeholders and avoids substantial complexities and potential costs associated with offering different compensation to the original and expanded portions of a net-metering systems. To maximize clarity on this point, GMP suggests that the Commission consider stating it explicitly in Section

5.108(C) to read “...the REC and siting adjustors applicable to all output of an amended system.”

Draft Rule 5.100 (November 28, 2022) at 32–33.

Locational Adjustors (Section 5.136)

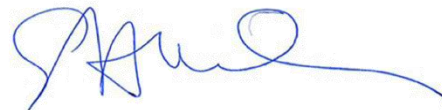
The locational adjustor approach in the Commission’s proposed enhancements to Section 5.136 appears to provide a reasonable framework that could be used to address development in areas that feature limited headroom on the distribution and/or transmission grid and to tie the outcome of any adjustor to the costs of constraints or grid expansion.

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

DATED at Colchester, Vermont this 13th day of January, 2023.

GREEN MOUNTAIN POWER CORPORATION

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