

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 19-0855-RULE

Proposed revisions to Vermont Public Utility Commission Rule 5.100	
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Town of Stowe Electric Department
Responses to Commission's Request for Comments

On December 2, 2022, the Vermont Public Utility Commission ("PUC") entered an Order on the proposed revisions to Rule 5.100 and requested comments from participants. The Town of Stowe Electric Department ("SED") provides the following response.

Introduction

SED supports the proposed revisions to Rule 5.100, which will streamline the review and reporting requirements for Net-Metering projects. In particular, the proposed updates for those projects that are 15kW and smaller in name-plate capacity will benefit from the proposal to file the registration and interconnection application simultaneously. This will help small municipal utilities respond to net-metering applications more accurately and efficiently.

SED supports revisions that encourage solar installers and customers considering net-metering projects to speak with the distribution utility as soon as possible about proposed projects. This will reduce costs and delay in considering the impacts to the distribution system from net-metering projects. As an example, SED relies on contracted power engineering to review net-metering project interconnection. Therefore, if SED can review site plans, one-line engineering drawings, and a project description that includes additional electrification projects (including electric vehicles, battery storage, and heat pumps) before a CPG registration is submitted to the PUC, then SED can reduce the administrative costs spent on gathering sufficient information to review proposed projects. This will allow SED to provide timely review of proposed projects and identify potential barriers to interconnection before a CPG registration and interconnection applications are filed. This will allow SED to only send those projects that require power engineering review to paid contractors, which will reduce the administrative burden and delay associated with the objection process for proposed projects 15kW and smaller.

Improved information sharing will also reduce the delays surrounding the single plant determination process. Under the current rules, the single plant determination has caused delays and significant staff time to SED during the interconnection evaluation. Sharing parcel information, facilities information, site plans, one-line diagrams, and a brief project description early in the process will improve SED's ability to respond accurately and timely. Having clear

information and timely updates from installers and customers will also improve SED's ability to track information changes and report information accurately to the PUC.

Section Comments

SED agrees with Green Mountain Power's interpretation of Sections 5.107, 5.107, and 5.108. In particular, SED agrees that the proposed amendment to Section 5.108 appears to bring clarity to the issue of compensation for legacy systems that increase the original nameplate capacity. The proposed language should make it expressly stated that the amended project would receive treatment under the rules in effect at the time the increased capacity is installed. SED does not have a billing system that can easily apply different adjusters and charges to systems based on a pre-existing capacity and the expanded (additional) capacity. Having multiple adjusters and charges to a single net-metering customer will also impact reporting and administrative tracking of data.

SED also supports the proposed changes to 5.110. SED staff receives feedback from customers regarding the transfer of ownership process as being confusing and burdensome. Because the distribution utilities have a direct point of contact to the customer during an ownership change, our staff is best positioned to help customers with this issue. SED also provides ownership change updates in Case No. 18-9045-RES, which can provide a notice opportunity for the PUC.

Respectfully submitted on January 13, 2023,

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