

**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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**REPLY MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SUMMARY
JUDGMENT**

Given the position of the Vermont Department of Public Service as set forth in its *Response to Burlington Electric Department's Motion for Summary Judgment* dated March 30, 2023, City of Burlington Electric Department ("BED") respectfully submits that there is no genuine issue as to the material facts and that BED is entitled to judgment as a matter of law that it is permitted to continue to provide cash payments and carry-forward credits beyond 12 months for pre-existing net metering customers for the remainder of the ten years from the date of system commissioning.

Dated at Burlington, Vermont this 13th day of April 2023.

Respectfully submitted,

By: William F. Ellis

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cc: Filed in ePUC
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