

Public Comments Re: Rule 5.100 Draft, January 13, 2016

| Commenter | Town | Comments |
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| Adam Bortz | South Burlington | <p>I am a devoted member of a Community Solar Array (CSA) and am very passionate about how this supports the building of clean energy in Vermont! When I found out my wife and I could not get solar panels on our own roof, we were so happy to hear this was an option for us as a way to save money and support solar energy. The proposed rule that would set an arbitrary 10-mile radius around CSAs as the limit for membership does not make any sense for Vermont!</p> <p>This kind of restriction would be a great disadvantage to both rural and urban folks in Vermont; too few rural would qualify and too many urban would be eligible to make them feasible.</p> <p>People's energy needs are very important and I would hate to see anyone in the state being shut out of taking advantage of this great clean energy program. It should be available for the greatest possible number of Vermont citizens so we can all help our state reach our renewable energy goals.</p> <p>Please leave access to CSA Membership open to all ratepayers within a utility area.</p> |
| Al Levy | North Ferrisburgh | <p>Everything the board does to update the net metering program here in Vermont should support the momentum that solar is providing to save this planet. With a keen eye on the outcome of the Paris Summit, it is clear that our future relies on a drastic reduction in our carbon footprint. Solar, as every one of the 165 countries represented there knows, can solve our problems with the proper nurturing. The sun produces more energy in one day than the entire population of the United States consumes in a year. We need to do our part and lead in every way possible.</p> <p>Please do not drive up the cost of net metering. Please encourage all who can go solar to do so. Please provide predictability. Please do not penalize those who have already made commitments in any retroactive fashion. Please keep this program strong. We are counting on you to make decisions that will benefit generations to come. We are counting on you to act in the best interest of the many rather than the few.</p> |
| Al Nevins | Vergennes | <p>As a participant in a CSA (Suncommon Ferrisburgh) I think it only fair to continue the net metering program EXACTLY as I bought into it for the term of my CSA involment (not just the 10 year grandfathering provision and other proposed changes).</p> |

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| Alan Johnson | | <p>First, I should point out that I have been Chairman of the Hartford Energy Commission for over 8 years, but that I am not representing the Commission or the Town in this comment: only myself and my household.</p> <p>I have recently heard that there is a concept being considered to reduce the solar adder retroactively. I and so may of my friends and neighbors depend on this adder to make our decision to support clean energy more economical in the face of massive subsidies to our current, unsustainable, primary energy sources. The idea that the PSB may allow utilities to back out of any 10 year commitment is such an absurd violation of the public trust, that if it is truly being put forth, I can only assume it is something of a straw man being put out only for the purpose of being beat down. This tactic can only be used to one 1 of 2 ends in this case: 1) make the real proposal seem less painful by comparison, 2) gain momentum in the form of public outcry to build support for a more progressive option. While I might be tempted to support the latter depending on the political climate, the tactic leaves me feeling a bit dirty nonetheless.</p> <p>All that said, I can only hope that my information is some how confused and that the Public Service Board is not seriously considering this clear violation of the public good that would not only be detrimental to the original intent of the solar adder, but also decimate public trust in any future commitments from utilities and the PSB. Until there is some other means of leveling the playing field in the energy supply, programs like this are critical to enable the markets to keep Vermont moving the the right direction.</p> <p>Thank you so much for all that you do for us, including considering my thoughts today.</p> <p>First, I should point out that I have been Chairman of the Hartford Energy Commission for over 8 years, but that I am not representing the Commission or the Town in this comment: only myself and my household.</p> <p>I have recently heard that there is a concept being considered to reduce the solar adder retroactively. I and so may of my friends and neighbors depend on this adder to make our decision to support clean energy more economical in the face of massive subsidies to our current, unsustainable, primary energy sources. The idea that the PSB may allow utilities to back out of any 10 year commitment is such an absurd violation of the public trust, that if it is truly being put forth, I can only assume it is something of a straw man being put out only for the purpose of being beat down. This tactic can only be used to one 1 of 2 ends in this case: 1) make the real proposal seem less painful by comparison, 2) gain momentum in the form of public outcry to build support for a more progressive option. While I might be tempted to support the latter depending on the political climate, the tactic leaves me feeling a bit dirty nonetheless.</p> <p>All that said, I can only hope that my information is some how confused and that the Public Service Board is not seriously considering this clear violation of the public good that would not only be detrimental to the original intent of the solar adder, but also decimate public trust in any future commitments from utilities and the PSB. Until there is some other means of leveling the playing field in the energy supply, programs like this are critical to enable the markets to keep Vermont moving the the right direction.</p> <p>Thank you so much for all that you do for us, including considering my thoughts today.</p> |

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| Alfred Blakely | Barre | <p>We installed PV Solar on our home in Barre in July 2010. A 14 panel, 3.192 kW system</p> <p>The system has produced 16.3 megawatt hours of power to date. About half we have used and half was sent to the grid via net metering. In that five and a half years the Net Metering payments from GMP have provided just over \$978. Power savings has been just over \$2,422. A total of just over \$3,400. We own the RECs for the system and have not sold them so the power our system produces is truly green energy made in Vermont.</p> <p>That amount represents about 1/3 of the final cost to us to install the system on our home. At that rate the system will pay back our investment in full in just over 16 years. We made the commitment to go PV solar because it is good for Vermont's children. It has saved 13.7 tons of CO2 also. At our age we may not live to see the money returned.</p> <p>Commercial investment is all about the money, period. RECs drive the profits. How much money can they make? How fast?</p> <p>If anything the Net Meter rate for home installations of PV solar should go up. Charging any kind of fee to home owners for going green denies the reality that such homes reduce the demand on the grid. Any fee to have home owners "pay their fair share" is just one more tactic to support commercial PV solar and deny home / farm installations benefits.</p> <p>http://tinyurl.com/PowerFromTheSun is the location of my web site for more details on my home install.</p> |
| Alysia Catalfamo | St. Albans | I recently signed up for community solar because my house had too much shade to work. It's an affordable option and would be a shame to lose. |

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| Andrea Mills | Webster ville | <p>These following portions of the proposal should be struck. They are restrictive and borderline exploitative. They discourage participation.</p> <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |
| Andrea Rogers | Burlington | <p>Please build on the success of net metering, continuing to provide adequate incentives and to allow for community projects, both rural (spread out) and urban. This is the wrong time to pullback.</p> |
| Andrew Christiansen | East Montpelier | <p>I am concerned that the draft rules that you are considering would harm the growth of solar energy in the future and create a hardship for those, like myself, who have already installed solar panels. In particular, I am concerned by proposals to reduce the credit while at the same time allowing new net metering fees without any limit or cap. In addition, the new proposal would change the rules of the game for those who have already invested. My wife and I are low income and it was a struggle and a sacrifice to incur the debt that we did to put these panels up. Changing the rates before the debt is paid off could be devastating for us. Finally, I don't understand how the 10 mile limit helps to encourage investment in solar energy, or is this part of the plan? - to discourage solar development as we have seen in other states. Please reject these rules and keep a strong net metering program for Vermont.</p> |
| Andrew Gilmer | Underhill | <p>I support the continued use of net metering to enable Vermonters to transition from dirty power sources to clean renewable energy sources. Energy sources that create carbon dioxide as a by product do not reflect the true cost of producing that power because it doesn't include environmental effects and therefore customers who produce clean energy should continue to get paid based on the current system.</p> |

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| Andrew Rainard | Burlington | I am in the process of looking at solar for my house. Without net metering, I will not install it, since it wouldn't make economic sense for me. |
| Anne Bower | South Pomfret | I urge the Vermont Public Service Board to retain in its regulations the current system of net metering for solar installations installed by residential and business electricity customers. The current net metering system allows those of us who have spent the money to put up solar panels to pay off our investment in a reasonable amount of time and to keep the cost of our electricity down. At the same time, knowing the net metering rewards are in place encourages more people to install solar, and this is what we need if we are to meet Vermont's efforts to reduce its carbon footprint. Net metering rewards for individual or group metering projects need to be powerful incentives-- please do not reduce them. |
| Anne Erickson | Corinth | This proposal is way off the mark. We have finally come to the point of needing to depend upon other energies such as sun and solar. No more fossil fuels. Please do not place restrictions on those people who have invested in the alternative energies. Allow Vermont to join the community of supporters of alternative energies. Thank you. |
| Anne Fayen | Strafford | Please support net metering that will continue to encourage Vermonters to switch to renewable energy sources. The health of whole planet depends on such actions |
| Anne Jameson | Marshfield | <p>I am concerned about the proposed new rule for net metering of solar electricity. I feel it is a distinct move backwards in the state's path to renewable energy use.</p> <p>If adopted, new net metering customers would only get the 'adder' for the system's excess power generation instead of a retail price per Kwh plus the 'adder' as in the current system. This would reduce the amount that most Vermonters who go solar receive for their power by as much as 20% (or more), thereby devaluing the solar electricity option and significantly slowing down its growth in Vermont.</p> <p>Restrictions on group net metering that require group-net metering customers to be within 10 miles of the system would make community solar projects more expensive and less available.</p> <p>The new rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment and if customers are left uncertain as to the value of their investment, fewer will invest in solar, thereby, again, slowing the move to renewable energy sources.</p> <p>In addition, utilities may choose to charge an additional, unspecified fee for net metering customers. Charging Vermonters for the right to go renewable will drive up the cost of net metering and drive down participation. What the fee might be and whether there would be a cap are also unknown factors.</p> <p>State rules should be building on the success of our current net metering system. Your draft rule would instead make it harder and more expensive to go renewable.</p> |

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| Ark Lemal | Vergennes | <p>There is no question about the long term benefits of renewables: financial, environmental, reduced-reliance-on-foreign-regimes, reduced need to have outsized influence over other countries to keep our access to energy affordable, etc., etc. This goes so deep and affects so many parts of our lives, this is not just a local issue or a small issue.</p> <p>The sooner we become sustainable the better. We have seen huge changes in VT since this became a viable investment. Yes, that is disrupting a lot of powerful interests, but those interests have demonstrated over and over not to be trusted with the public good. Utilities should see buying the extra power from solar the same way it saw buying power from VT Yankee or Hydro Quebec. It's just a source of power to be purchased and sold. Allowing utilities to add a fee, especially without any restrictions on what that fee could be, is asking for trouble.</p> <p>We should be building on the successes of net metering! It's getting better fast, but the new draft rules will make it harder, more expensive and the investment value over the long term will not be clear or knowable. This will slow or kill the advancements we have made, which may be the point of these new rules.</p> <p>Keep an eye on the big picture. This one is important.</p> |
| Armand Messier | St. Albans | <p>My wife and I are proud owners of a 7KW net-metered solar power energy system that is a critical component to our net-zero home located in St. Albans, VT. The future of distributed energy depends upon homes and businesses that install renewable energy systems such as solar power. The market value of renewable energy credits, which get sold back to our utility company (Green Mountain Power) is also not only important to Vermont's energy portfolio, but to the future of reducing and mitigating the reliance of fossil fuels.</p> <p>We are disappointed in the most recent proposal by the Public Service Department. This is a step in the wrong direction regarding renewables and in particular, the development of new solar for homeowners and businesses. The disappearance of the "solar-adder" will ultimately limit new installations of renewable energy projects. The newly proposed solar incentives for new construction and excess power production are a step in the wrong direction from the incentives currently offered. Lastly, allowing power companies to charge fees to homeowners and businesses that have gone solar is very much a penalty for using renewable energy. Recently in Nevada, these fees and as well as the elimination of the solar adder have lead to losses of thousands of jobs in the renewable energy sector.</p> <p>I would urge the Public Service Board to reject most, if not all, of the recent proposal by the Department of Public Service. As solar owners, we have made a significant and important investment in renewable energy that is beneficial not only to ourselves but to the future of Vermont's energy plan. As homeowners, we made a serious financial investment in solar because it was both beneficial and the right thing to do. The financial changes as proposed by the Public Service Department will severely impact the payback of our investment as well as the future development of renewables in Vermont.</p> |
| Art Trezise | Waitsfield | <p>Kindly orient your judgement on Net Metering Rules so as to stimulate private investment, particularly in solar panel arrays which imply long-term commitments. The 10 mile limit, for example, may be a gratuitous obstacle in some communities, excluding those investors whose location precludes an on-site installation.</p> |
| Arthur Hynes | Hinesburg | <p>Please keep net metering as strong as possible and make it as easy and affordable as possible for for all Vermonters to go renewable.</p> |

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| Barbara DeAngelis | Washington | As a senior citizen, I made the decision to purchase a solar Tracker because I believed in my lifetime I would see it pay for itself and generate a small amount of income in addition to being a way to decrease my carbon footprint. I would feel very cheated if it changed now. |
| Barbara L. Johnson | | Rule 5100, as drafted would lower the value of solar energy for Vermonters who have made the choice to use this source of clean, affordable energy, and adding a monthly solar fee would further penalize those who have made or will make this change in the future. I host a solar array that includes nearly 30 families, more than half of whom are my neighbors in Hartland. Since their home sites will not support operation of efficient, individual solar arrays, they have been very excited to have the opportunity to access solar energy in a way that is both efficient and affordable. Vermont should be taking every action possible to enable more homes to use solar energy rather than limiting access and imposing punitive fees. Such fees are discriminatory and undermine the ability of many Vermonters to choose solar energy through participation in community arrays. |
| Bert Torstenson | Brandon | We had always thought about going solar. The thing that pushed us to go solar was the financing package. Because of net-metering, it's basically not going to cost us any more to purchase and finance a solar system than what our power bill was. That made it worthwhile for us. That 6 cent solar adder makes a difference. If I am paying a financed solar system payment on top of a utility bill, I wouldn't go solar. |
| Bill Healey | Sutton | I will never be able to afford to install a system on my home but even so we must continue to encouraging anyone who may be able to do so. We all have to keep in mind the long range goal, the continued reduction of fossil fuel and the future we wish and hope for our children and grandchildren. |
| Bob Walker | Thetford Center | I am chair of the Thetford Energy Committee and former director of Sustainable Energy Resource group and am very concerned with a couple of things in your proposed net metering rules. First the 10 mile criteria of member living to a community array might preclude some residents from Thetford from participating in a Thetford based community solar array. I encourage you to keep the existing criteria of membership being open to anyone in the utility territory. I am also very concerned that the elimination of the "adder" will dramatically slow down expansion of solar development and the proposed "Site Incentive" and "Excess Generation Credits" are very poor substitutes, providing very little added support for solar. I encourage you to reconsider these aspects of the proposed rule as they will present a major impediment to the expansion of solar in Vermont. |
| Brock Giblan | Burlington | Climate change is the issue of our time - why limit the amount of renewables when we aren't limiting fossil fuel infrastructure such as the now approved gas pipeline? |

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| Bruce Lierman | North Bennington | <p>I am a member of the Southshire Community Solar project meeting in Bennington. We have been in the process of establishing a community solar project since last April, and expect to begin construction this spring.</p> <p>In reviewing the proposed changes to the Net Metering Program I have three concerns related to the draft changes: 1. Geographic constraints on customers for community systems. The draft rule would require group net metering customers to be within 10 miles of the system. We have several pledged subscribers are near to exceeding the maximum distance. We are discussing membership in the project with individuals living as far as 30 miles from the proposed site. There seems to be no technical or logistical basis for this restriction, and it will definitely limit our ability to subscribe users who could benefit from the central site desirability and economies of scale. Given the current restrictions on system size, this restriction seems obstructive and irrelevant. 2. Limiting the grandfathering provision to ten years. Solar is a long-term investment, and one of the biggest concerns of our members and potential members is the stability of the regulatory environment. How can one evaluate a long-term investment when the regulatory environment is subject to change? Making this change effective for systems implemented in the next year will drastically inhibit solar developments such as ours that are already well into the planning process. That seems an excessive and unfair burden on those who are willing to take risks as early adopters. 3. Allowing Utilities to implement unspecified fees on renewable projects. One of the great advantages of Vermont's regulated utility environment is that this kind of undefined and unspecified fee is discouraged. Why would Vermont want to weaken the controls we exercise to make sure customers and rate-payers are treated fairly?</p> <p>Meeting our mandate for renewable energy means encouraging individuals and families to make the decision to invest in renewables by providing a fair, stable regulatory environment. All three of these proposals will inhibit development of renewable sources, particularly community solar projects, creating questions and introducing incalculable factors into the potential subscriber's decision to go solar. I urge you to drop all of these proposals from consideration in the Net Metering Program.</p> |
| Calista Diane | Bradford | <p>Please do not do anything to jeopardize our net metering or to slow our advances toward a state that is committed to renewable energy sources.</p> |
| Carl Ashley | Huntington | <p>I am concerned that the VT PSB is spending too much time talking to the power companies and not enough weighing the concerns of the present and future net metering consumers. I will have had our solar panels on net metering for 3 years this April. The partnership between government, electric power users, and power producers has been working well for my family. We have been driven to reduce our power consumption. Also, our solar system is on-target to recoup our investment in less than 10 years.</p> <p>However, recently I have seen that the CEO of our power supplier VEC is complaining that they can build solar arrays and get power much cheaper than net-metering (read it for yourself: http://www.vermontelectric.coop/content/Co-Op_Life_-_Summer_2015_Final.pdf). Instead of extolling the virtues of generating power closer to where it is consumed, Hallquist wants to pay wholesale prices to individuals and to charge them retail priced for their consumption. These are hardly the actions of a faithful partner.</p> <p>Your plans will greatly reduce the value of the consumer generated solar electricity, by putting greater limits on the locality of net-group metering, and expanded authority for the power company to extract new monthly fees; it is a bad choice for the future of community involvement in solar net-metering. With VEC and other power suppliers putting up massive solar panel arrays, and individuals being penalized for investing in this technology, it appears that the only solar future in Vermont is with the big companies. This is hardly the grassroots approach that Vermont is known for. Please reconsider the Rule 5.100 Net Metering and keep Vermont's net metering program strong.</p> |

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| Carol Sheldon | Sharon | <p>Dear members of the Public Service Board, What makes Solar and Wind power attractive to the citizens of Vermont is the fact they will receive a reward for their investment into green power by receiving the advantage of Net Metering.. What are you thinking?.. Must we be fined for this improvement by the utility companies?</p> <p>Please extend the 10 year grandfather provision in the state of Vermont and then make the decision as to whether it is beneficial. I feel that people have donated a large portion of their income in order that we may be known as a "clean and green state". Let's encourage others to do so by approving the extension.</p> |
| Cathy Tubhope | Isle La Motte | <p>I was fairly disappointed when a couple of weeks ago I heard that the credit duly earned by those generating electricity, either wind or solar was going to be cut. I realize that the kinks need to be worked out but surely the purposed cut is ridicules.</p> <p>Now that some are finally getting somewhere with green renewables, the power companies are complaining about the amount to be credited.</p> <p>We as a state are moving very slowly in an area I thought we would jump on. I don't understand why it seems feet are dragging. We need the jobs that renewables would generate and it would feed into our economy as well as reward those who are able to afford doing it already.</p> <p>I would love to go either wind or solar and I can not afford either but if I could have invested the very last thing I would want to see would to not get the paid for the unused power my investment generated - that's a huge slap in the face and a huge deduction in the Public Service Boards integrity. Are we to think that again GREED wins and no one cares about the environment or it's just too bad to those who invested? We don't have room for actions or lack of actions like that.</p> <p>This type of situation will only slow instead of grow green renewables and that is going backward. As it is those who do invest put out a hefty sum, I am guessing they are counting on the proper return as I am sure it was considered in the equation in investing in the first place.</p> <p>The possibilities have been around for a long time as well as the more recent incentives to be environmentally safe guarding with this field soaring through the USA never mind the state of VT, the Power Companies and the Public Service Board has had plenty of time to ready themselves to deal with this.</p> <p>Doing anything other than the right thing here, will drive up costs and slow down production and moving forward. Do the right thing, plenty of people are watching this, take the high road and earn respect as you follow your responsibility to those who are watching, interested and invested.</p> |

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| Charity Carbine-March | Wolcott | <p>As a solar owner, the idea of retro-actively changing the value of the solar credit I get from my utility and adding a new fee is unfair and would be painful financially for me and my family.</p> <p>My wife and I are paying for our solar system in fixed monthly payments. This fixed payment structure is what made it possible for us to go solar while not breaking our family budget. We made this financial decision to invest in clean energy under the existing rules. We simply don't have extra cash to splash around should the value of the solar credit be retroactively changed. I urge you not to pull the rug out from under us.</p> <p>Thanks for your time and attention to this matter.</p> |
| Charles Breiss | | <p>I would encourage the Public Service Board to keep the present net metering program. As it presently exists it encourages individuals to participate by installing renewables with the additional incentives paid per kwh. A slight reduction in the incentive may be warranted but elimination of the incentive is a serious mistake. This would slow the progress of reaching our energy goals by 2050 and that is not what the people of the state would want. I also do not agree with the notion of restricting the involvement of community solar by distance from the solar pv array. This also does not make sense to me. From research in field that we have gathered over the years, between 20 - 30% of the existing homes are actually good sites for on roof solar. This will require significant solar pv production from community solar as we switch from fossil fuel to renewables. Restricting the availability of this option for renewables is counter productive. I would also make a distinction from industrial solar and truly community solar. In our town we are beginning the process of installing a solar array that any member of our town or members of the utility can be part of. The scale is around 75K watt and will be owned by the members of the solar field LLC. This type of community solar should have it's own designation and not subject to the same rules as the larger institutional solar systems. In general residential and commercial systems should be separated and have there own set of rules. I am a residential builder dedicated to moving Vermont closer to the goals of the state's comprehensive energy plan. The present systems has been working very well for my business and my customers, the changes you are considering would significantly slow the progress we are making.</p> |
| Charles Leighton | Newfane | <p>There are always a million reasons not to invest in the long term. We can't allow that thinking to cloud the issue when we are looking at Net Metering. People very much need to be persuaded that the long term is in their highest interest. Supporting the current Net Metering program for the Adder is critical in maintaining the incentive to make the choice in favor of our long term future.</p> |
| Charles Parent | Hinesburg | <p>These rule changes are ridiculous. We should be making it easier for people to go renewable not harder. We have a net metered solar electric system and we love it. Sometimes we wonder just who the Public Service Board is working for. Let's put the environment first.</p> |
| Cheryl Leiner | Cavendish | <p>Do not restrict group net metering using a ten mile restriction. Keep net metering affordable and readily available to all Vermont residents.</p> |

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| Chris Badger | Waitsfield | <p>Our family installed a 4kW solar array on our home in Waitsfield, VT a few years back and we are happy to have contributed to Vermont's green economy, diversifying our renewable energy in the state and taking ownership of our own energy usage and generation.</p> <p>We were fortunate to have a novel solar partner in SunCommon and a compelling financial opportunity with the new "solar adder" legislation. As I look at the growth of solar in the Mad River Valley with many individual systems, two town municipal arrays and a new community solar project, I think that the state got it right in establishing an array of financial drivers - grants, feed-in tariffs and low interest loans to help all Vermont electric customers choose solar and invest in our shared energy future.</p> <p>However, I am concerned that a few of the specifics of the draft new net metering rules may undo or substantially weaken the critical financial and structural elements to net metering that created such a robust green economy with many green jobs for years to come.</p> <p>For those folks that made the early investments in solar and those to come, I think that the PSB can do better to:</p> <ul style="list-style-type: none"> - eliminate the fees - which seem vague and arbitrary - go back to group net metering within a utility service territory (allows systems to be sited where they are most cost-effective and minimize adverse impact rather than forcing it to be sited near the physical address of the customers - develop a longer term contract with customers aligned better with the life of the system - increase and create a slower reduction of the feed in tariff to sustain the strong market that currently exists for solar. <p>Thanks for valuing our input in this process.</p> |
| Chris Cleary | Berlin | we-vermonters should keep creating new clean jobs by expanding net meetering |
| Chris Gluck | Underhill | Solar is not viable on my own property so I became a member of a CSA through Sun Common. If the PSB enacts some of what they are proposing I probably would not have been able to participate...and that would likely be the same for many others. I am so happy to be doing my part to make at least some of the power that I need from a renewable resource. Please keep the net metering program reasonable so that as many Vermonters can participate as possible. Thank you |

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| Chris Hebb | Post Mills | <p>I am considering investing in solar and am concerned with these issues.</p> <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |
| Chris Wasser | Richmond | <p>This draft contains some real positive changes that I think will improve net metering, including provisions that would make it easier to build renewables on built and impacted environments, like landfills, parking lots and rooftops. Well done!</p> <p>Unfortunately, the draft also contains several changes that should cause concern for anyone who wants to see more locally-produced clean energy and believes Vermonters should be able to be part of Vermont's transition to renewables. Specifically:</p> <ol style="list-style-type: none"> 1. The value for solar falls short. 2. The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. 3. The rule would create significant uncertainty for all net metering customers. For new net metering customers (2017 and beyond), the rule offers no stability. 4. Utilities may charge an additional, unspecified fee for net metering customers. There is no indication as to how much this fee could amount to or a cap on what the fee might be. |

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| Christine Chalpine | Cornwall | I agree with VPIRG's position that incentives for going solar need to remain strong for individual house holds. We need clean, renewable sources of power and I know a lot of people who would like to do it, but need every possible incentive to help with the affordability in order to go solar. It makes sense to me that to have solar generation happening in small, individual settings rather than large projects that can be eyesores. However, community solar also seems to be very popular for households that cannot host an array on their own property, but would like to invest in solar. For those people, there may not be a project within the 10 mile proposed limit for them to invest in. I think it is important to thoughtfully site larger projects with the local community's support, but once sited, I believe that anyone should be allowed to invest in it. |
| Clarke Comollo | East Dorsett | Of course we should support more net metering!!!! |
| Constance West | Manchester | <p>Please continue the work to build on the success of net metering.</p> <p>Traveling around the country I have met many people who are amazed at Vermont's success in getting towards renewable goals quickly. Please do not make it harder and more expensive for people to get into renewables. Do not reduce the full value that net metering customers get for every kWh that they generate. Although I am aware that the "adder" rate will go down over time, this was among the many reasons I decided to invest in Community Solar last year - seeing that I could amortize my investment in some reasonable amount of time.</p> <p>Please do not change the rule to require that group net-metering customers to reside within a 10 mile radius of the system in which they invest. I own a very rural property, such requirement would, in fact, deny me the right to invest in community solar for that property.</p> <p>Please do not change the rule to provide only a 10 year grandfathering provision for systems installed before 2017 - this could leave me, and many others who thought they were doing the right thing by investing in Community Solar with a very unattractive investment. This will discourage others from investing in Solar. We need to invest for the long term.</p> <p>And please do not allow the utilities to inaugurate an new monthly fee, as this will drive down participation in renewables.</p> <p>Vermont has much to be proud of in this field. The net metering rules have helped immensely in moving Vermont into the forefront of renewable use. The changes that will make it easier to build on built and impacted environments, i. e., landfills, parking lots, and roof tops are truly commendable.</p> <p>Please continue to build on success. Do not weaken this very good program.</p> |
| Courtney Dobyms | Norwich | <p>I'm writing to express concern that revisions on the net metering rules should be such that they will continue to encourage renewable energy through solar installations. I am very happy with my solar array. I'm afraid some of the new provisions will make it harder, more expensive and more uncertain for future installers/customers.</p> <p>I've been so proud of Vermont and its successes around supporting solar Oenergy. Let's continue to lead the country in this way.</p> |
| CR Lill | Chester | Net metering has proven to be a successful incentive and strongly urge you to keep it intact going forward |
| Crystal Zevon | Barnet | <p>As someone who is an environmental activist, and for whom buying a solar system for my own home was not an option due to shading, I was glad to learn of the CSA option. By becoming a member of a CSA in Benson, over 100 miles from my home, I am proud to still be able to do my part and contribute to a clean energy future.</p> <p>I encourage you not to limit CSA membership to a 10 mile radius of the array.</p> |
| Dale Copps | Windsor | Anything -- ANYthing -- that can promote the use of renewables needs to be implemented at the greatest speed possible. And anything that hinders that implementation, particularly considerations of dollars--where they are coming from and where they are going--must be set aside. We can't transition to renewables too quickly and our public service boards need to realize this. Today is not the time for business as usual. Our very existence depends on changing our ingrained habits. |

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| David A Fisher | Richmond | <p>It is crucial that Vermont continue its strong commitment to renewables in the coming years. It is not the time to make the support for renewable weaker. Given the success of the present rules, guidelines and exemptions, it is clear that the current "system" works well and that it is helping us drive towards a energy independent future.</p> <p>The 10 mile rule for community solar will exclude some towns from doing any at all. The mountainous and forested land that much of Vermont is covered with will not provide good solar array installations. however, allowing longer distance ventures will allow more communities to participate. The town of Richmond is mostly flood plane and wants to do community solar in a town roughly 20 miles away where they have plenty of room for it. Under the new rule They would be forced to use up precious small patches of farm land to accomplish their goal.</p> <p>Perhaps someday it will be evident that de-incentivizing the solar grid tied power is a sensible idea and that it is not cost effective any more but today certainly isn't the day. The Federal Government is still supporting the oil industry and it's been past peak for decades.</p> <p>Please keep the fees low and gradually decrease incentives over tens of years. Think of our state's goal when considering the review of grid tied systems. We still have a long way to go.</p> |
| David Barbee | Bellows Falls | <p>Please continue to give Vermonters strong financial incentive to go solar, including community solar. Please revisit your net metering proposal per these considerations. Thank you!</p> |
| David Bayer | Putney | <p>Please do not dilute or in any way undermine Vermont's net metering rules and thereby make it more difficult for vermonters invest in renewables for their energy needs. Thank you</p> |
| David Carmichael | South Burlington | <p>Now is the time to be encouraging moves to greener energy, not discouraging potential customers!</p> |
| David Lipking | Lincoln | <p>I am a solar homeowner, and I find this proposal to more than unfair! We made the decision to put in solar panels in order to save money and be environmentally conscious. Part of our decision was the solar credit that was available in 2012. The idea of retro-actively changing the value of the solar credit I get from our utility and adding a new fee is outrageous. This would feels punitive and would be quite painful.</p> <p>We made our decision under the existing rules. We can't afford to have higher utility bills as we just started a new business. Please do not support this proposal. It would be like pulling the rug out from under us!</p> |
| David Ward | Northfield | <p>I support continuing net metering in Vermont in its present form. I believe net metering is an important and valuable incentive to residential consumers to consider going solar. I urge you to keep it that way.</p> |

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| Dayton Brown | | <p>My wife and I went solar in 2014 in order to save money and help contribute to a clean future for our growing family. Even though we did not have the optimal site, we decided to go with a roof-mounted array that would eventually pay off with the current incentives. We are not wealthy people and we made this heavy decision with the key assumption that Vermont would stick to its word about investing in renewables, and not slow down the process.</p> <p>The possible reduction in the solar adder and a monthly fee was not built into the economics of our financial decision. Moving forward with this retroactive penalty will hurt our family and hundreds of others that want to participate in this wonderful solar revolution that you've helped create.</p> <p>The only way that our income was able to afford such an investment was through long term financing, and this drafted change could make that harder for future families as well. As native Vermonters with modest incomes, I hope that you think about the people that this will impact the most. Please keep solar attainable for people like us.</p> |
| Dean Dudley | Jericho | <p>As a solar energy system owner, the PSB proposal of retroactively changing the value of the solar incentive credit we get from our utility is unfair, financially painful and a disservice to those of us who are concerned about our environment and are willing to make significant changes to benefit the world we live in.</p> <p>My wife and I are retired and don't have a lot of disposable income. But the benefits of solar along with the added incentives that GMP offers, via the "Solar Incentive Credit", plus the 30% federal tax credit convinced us in taking out a 12 year loan to cover the solar installation. It seemed like the right thing to do for our environment, even though loan payments are higher than the bills I was paying GMP. But with the Solar Incentive Credit we were confident that we could generate enough of a credit balance with GMP to carry us through the winter months without having to pay GMP and the solar loan. And GMP stated that we would receive this incentive for ten years. Your unfair decision would negatively change that.</p> <p>To make my point, our solar was installed mid June of 2015. Since the day it went live, till the December GMP bill, I have not paid GMP anything, and a majority of the credit I've accumulated to cover these charges was from the Solar Incentive. If you change this so that we only get the adder on the excess KWHs, the following is what I could look forward to. From mid June to mid December 2015, our Solar Incentive credit totaled \$325. If you eliminate that incentive and only give credit on the excess KWHs, I would receive \$114 -- a \$211 loss. I would not have enough credit built up to cover me through the dark months. This is unfair and unwarranted, especially when this is coming from the PSB, which I've assumed meant for the beneficial service of the public you represent. You most definitely are not doing us a service and I fear that you are being influenced by outside sources, such as the oil lobbyists. I'm hoping you would think of your constituents ahead of these outside influences.</p> <p>I have promoted solar to my friends and family. Our son has been approved for solar installation in the spring but this news is not what he wanted to hear and could influence his moving forward. I'm sure, at least I hope, this is not your intent, but your actions seem to be telling otherwise.</p> |
| Deb Governale | | <p>My families choice to join a CSA was to support Vermont's solar industry. Since I am aligned with Vermont's goals of reducing our use of carbon based fuels, the idea that this state would go back on the promise it made to me, guaranteeing a minimum of ten years where I could count on receiving the same "solar adder" amount is beyond appalling.</p> |

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| Denise Dean and Ray Broderick | | <p>As homeowners with a rooftop solar array, we're concerned about the proposed changes to the state's net metering regulations, in particular the addition of a monthly solar fee and the reduction in the value of solar credit for homeowners.</p> <p>My husband and I thought long and hard about going solar. With 2 kids in college, it was an investment we really couldn't afford to make. Over several days we did our homework, read the research, talked to our friends and neighbors and made a calculated, educated decision that we could make the investment. The math did work but barely. Sill, we felt it was an investment we couldn't afford not to make given where fossil fuels are taking us. Assuming the current regulations stay in place, we are considering an air source heat pump and electric car, all powered by our solar system, if we can swing it.</p> <p>The proposed changes will financially burden those of us who have already invested in renewable energy, discourage more homeowners from doing the same, and consequently stall one of the fastest growing sectors of the Vermont economy, the solar industry, which is providing jobs at a faster rate than many others. At a time when our state, our country and the world are laying out progressive initiatives to battle climate change, the proposed changes are a step backward.</p> |
| Diane Cushman | Bristol | <p>Vermont needs, and should lead the US, in supporting clean energy use. We should keep the current net metering design and NOT make it less attractive or less rewarding than it is now. Charging a fee on our personal investments (i.e. in solar power) feels like a punishment. Please think long and hard about imposing burdens on Vermonters who are trying to do the right thing. We need to find a balance between the interests of business and private citizens.</p> |
| Diane Leydon | South Hero | <p>We use our solar panels to help put less carbon into our air.</p> <p>Net metering is important to us. !!!!</p> |
| Diane Siegriest | Westford | <p>Let's build on Vermont's success. Why are you considering changes that would make it harder and more expensive to go renewable?</p> <p>We have just signed up to install solar panels at our residence, because it is the right thing to do. But many people need to make it an economic choice. Please change your draft rule to make renewable power available to anyone.</p> |
| Don Dewees | North Ferrisburgh | <p>I understand that Rule 5.100 - Net Metering - includes some provisions that would be a disincentive for more widespread investment in solar systems in Vermont. Specifically those portions that reduce the amount paid to solar producers, the proposed 10-mile limit on distance from community solar projects, the uncertainties about long-term stability of net-metering payments, and unspecified fees that utilities may impose on net metering customers are all disincentives for Vermonters to get started with solar. Please consider remedies for these flaws in the proposed Rule.</p> |
| Don Ross | Vergennes | <p>Please keep net metering intact.</p> |
| Donald Glauber | | <p>I believe that retroactively changing the value of the solar credit will be unfair, painful and punitive to Vermonters who make the wise and courageous choice to invest in a clean energy future. To increase their costs now would imply your support to perpetuate fossil fuel dependence and ignore our responsibility to be leaders towards clean energy and lowering carbon emissions. HOW ARE YOU SERVING THE PUBLIC WITH SUCH POLICIES? I REALLY WONDER.</p> |
| Dori Wolfe | | <p>I strongly disagree with changing net-metering rates for those citizens and businesses that have already invested in solar - that is retroactive and against contract law. Unacceptable. And on top of that, the idea of adding a unique cost onto those that are investing in renewable energy - all helping the state reach its 90% renewable goal - is backwards. If funds are needed, assess the fossil fuel companies.</p> |

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| Dori Wolff | Strafford | <p>We need to get 90% renewable by 2050, and solar is a solution that is working, that is putting people to work. Why is it that we aren't doing everything in our power to make the road smooth for solar?</p> <p>When we find a land owner willing to lease for a community solar array with land that is not prime agriculture, that is not in anyone's view shed, but close enough to power to be feasible, and we have a community hungry to invest in more renewables - why is it that we can't move forward in a methodical way knowing we can interconnect at a reasonable cost?</p> <p>Community Solar / Net-metering is threatened, and it shouldn't be. It is putting people to work building much needed infrastructure for a renewable future, it is putting local dollars into projects, keeping the money local - and yet it is being threatened by its own success. And the PSB wants to allow utilities to charge a monthly fee to net-metering individuals that are helping create the solutions, that are investing in this good work. Really? We should be charging the carbon polluters, not the solar generators. Where is our backbone, green state of Vermont?</p> <p>- Net-metering caps that should not be there at all are stopping movement, stopping jobs, stopping progress. We need to remove the cap so we can plan these projects and get them built in 2016.</p> <p>- Do not retroactively charge early adopters for investing in more expensive solar. Those who have already invested - in essence entered into a contract with the state - should not have those contracts reneged. Vermont needs to do better than that.</p> <p>Thank you for helping steer this ship toward a renewable future.</p> |
| Doug Clarner | East Burke | <p>i was sold a solar system based on the notion that my monthly electric bill would not change. retroactively changing my policy would mean that someone has gone back on their word. the financial decisions that my wife and i made when deciding to go solar are important and were taken seriously. changing the program now would be unethical and financially painful.</p> |
| Dustin Smith | Burlington | <p>We need to continue moving in a direction that enables and motivates Vermonters to move toward clean energy. When considering incentive economics and renewable energy, one can encourage new customers to participate with better results. As a young Vermonter that does not own a home, I can not directly relate to the benefits of an electricity generating system that feeds back into the grid. One of the biggest motivators that would tip my decision in investing in a system like this in my first home would be the credits I would get for the extra kWh I generate. Build on the positive results net metering has given Vermont. Solar is booming.</p> |

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| Edward Hutchinson | Plainfield | <p>The proposed rules for net metering will slow the transition to renewable energy. They should be reconsidered.</p> <p>As a WEC customer our system already generates the first 200 kWh that is net metered at the \$.0979 net metered rate, the remainder is generated for the \$.2185 rate except that any excess generated over a year is deleted from our credit. About a third of our system's total generation is used "on-site" in real time. It never passes to the grid at all and is not measured by WEC. It is essentially used at the net metered rate, but imposes no effect on the utility (except to reduce our use of the grid, and thereby reducing the load on infrastructure). Two thirds of our annual generation is net metered. It passes to the grid and is then used at night and in the winter, except that any excess generated is presumably used by our neighbors and billed to them but with no cost to WEC (there is no compensation for the excess generation at all because excess credit is cancelled). Since we purchased a plug-in vehicle we no longer have any excess to be lost.</p> <p>Having a plug-in vehicle is a strong incentive to increase the size of our PV system but with the current rules we probably will not do so. If the rules get more prohibitive we certainly won't. To the extent that public policy intends to decrease the use of petroleum for transportation in Vermont, it would be good public policy to make the use of plug-in vehicles charged with PV systems more financially beneficial not less so. The proposed net metering rules are inconsistent with transportation policy.</p> <p>Adding additional unspecified charges to a net metered customer's bill will substantially increase the time required to recover the cost of the system. At some point there will be no economic benefit to owning a PV system.</p> <p>The ten mile rule for group net metering is too small. I understand that it would be a burden for the utilities if a large array is placed in some remote corner of the state and the group of users is 50 or more miles away, but 10 miles seems too small a distance. If a large array is sited properly, and adjacent to three phase service, a 10 mile radius is an immaterial distance. Many users are already ten miles from their substation. We happen to live three miles from town up a dirt road and are a considerable distance from a substation, I have no idea where it is, but it could very well be more than ten miles away.</p> <p>Having uncertain rules after 10 years makes accepting a contract for 20 years very unpredictable, yet most of the "leased systems" have 20 year contracts, and 15 or 20 years is a typical "payback period" for customers that own their systems but can not use the tax advantages of depreciation expense to recover their cost quickly.</p> <p>After all incentives, our system cost about \$17,000. Our annual cost before the PV system was built amounted to about \$1,200 per year. The system was designed to produce approximately what we were consuming (with an allowance for the de-rating curve as the system ages). That is a 14 year recovery time excluding finance charges (which are somewhat offset by increasing retail cost of electricity). We had available cash that was earning almost nothing, so finance charges don't apply to our system, but most potential PV owners are not so fortunate.</p> |
| Edwin Johnson | Brownsville | Please do not dilute Vermont's current formula for support of net metering. |
| Ehren Miller-Nogueira | East Calais | We should be building on the success of net metering and the draft rule makes it harder/ less incentive to go renewable for regular people. You are supposed to work for us, not create monopolies. |

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| Elise Marks | Burlington | <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |
| Elizabeth Monley | South Hero | We should be doing everything in our power to increase the amount of renewable energy in Vermont, and this is the first, best way to do so. |
| Elizabeth Ezerman | Williston | I think you should make it easier/cheaper, not harder for people/groups to go renewable. The proposed changes and resultant uncertainties and restrictions would make it more difficult for those teetering on the edge of being able to/wanting to 'go solar' to do so. The early adopters are already in; the next wave needs a push, not more prohibitions to get going. I am sure this has to do with power companies and their bottom lines, but the climate is too important and we are already behind the 8-ball. Please don't make new provisions that will make it harder/more expensive for those trying to do a service for the state and the world. Build on success! |
| Elizabeth Filkorn | | <p>We believe in a clean energy future. We invested first in residential-scaled wind production, now in residential solar production. We are proud to be among Vermont's small scale renewable energy producers: we are showing the rest of the country how easy it can be to pull together and build a clean energy economy. My utility credits my bill for my renewable energy production, and that's a key part of making this work for all of us. The idea of retro-actively changing the value of the credit I get from my utility and adding a new fee is unfair and would throw our good progress in reverse.</p> <p>Please do not alter the terms of our Net Metering agreement that makes it possible to participate in making a better future for our children, our state, our planet.</p> |
| Elizabeth Monley | South Hero | We should be doing everything in our power to increase the amount of renewable energy in Vermont, and this is the first, best way to do so. |
| Elizabeth Ryder | | As an active community member in my town, I'm often talking to folks who want an unbiased opinion about solar. Stability is key. Folks are considering a long-term investment and it simply doesn't work to change the rules. |

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| Ellen Gershun | | <p>As an environmentalist, when I first found out that SunCommon was offering a way for me to be able to invest in solar for my home and farm (with no upfront cost and a fixed monthly payment) I was very excited and signed up for more information. Then I found out that being a customer of Washington Electric Coop I wasn't going to have access to the same net metering incentives as all the other utility customers and very quickly realized the economics didn't work.</p> <p>Since Vermont has made it clear that as a state we want to promote renewable energy, we should have policies that align with this goal. Allowing utilities to charge an additional unspecified fee for net metering customers only discourages individuals from building solar at their homes. A fixed, limited fee to capture the fixed costs of utility infrastructure and administrative costs associated with net metering is reasonable. What is not reasonable is to allow utilities to charge any other additional fees, especially ones that are unspecified.</p> <p>Our net metering policy should make it easier, not harder, for households of any income to support renewable energy.</p> |
| Ellen Malona | Wells | <p>Please keep Vermont's net metering progressive and strong! We need to support strong participation in renewable energies, by making it pay for citizens to "go solar". Many Vermonters are concerned about rising energy costs, and they want to do the right thing by investing in solar energy. Please keep this a viable option by keeping power produced by solar panels worth full retail rates plus the adder incentive. As a state, we need to work together to get the most renewable energy production possible. I personally don't have a good site for solar panels, but I would be willing to invest in something that will provide renewable energy to be produced to supplement conventional energy if I could see the investment pay off in the next 20-30 years.</p> <p>Please give us firm footings to explore renewable energies now and in the future because if we don't, all the money in the world won't save our earth, and that's really the most important thing-we won't be able to undo damage committed by the uninformed or greed driven people who make the rules.</p> |
| Eric Hefel | Underhill | Let net metering as it is |

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| Erik Nielsen | Brookfield | <p>I am writing to ask you to keep Vermont's net metering program strong. Net metering is a success, so please build on it, don't make it harder and more expensive to take part. In the proposed rules the value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |
| Erik Reisner | Warren | <p>Please keep net metering as a positive movement for Vermont. It has been successful thus far, and Vermont should continue to be leader in clean energy. Limiting the program will hurt the momentum we've established and send the wrong message to our citizens and vacation guests.</p> <p>There should be an incentive for consumers to move to renewable energy, not a deterrent!</p> |
| Ero Lippold | South Burlington | <p>Please consider the damage that these changes would have to climate change. I have solar on my house and am doing my part. You need to keep going with encouragements for the private sector, not take steps backward.</p> |

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| Fran Renauld | Westminster | <p>I understand that the Vermont's Public Service Board is considering an amendment that will likely hinder our ability to transition to clean power sources,thus slow our progress towards renewable energy.</p> <p>Please consider, instead, building on the more positive past success of net metering; instead of making it harder and more costly to go renewable. We need to be enticing renewable energy interested consumers instead of making it harder, more expensive and then less likely to be considered.</p> <p>Thank you for reading this and considering my opinion.</p> |
| Galen Rhode | North Bennington | <p>I share VPIRG's views on a strong net metering program. I have personal invested hundreds of thousands of dollars into a system, and now the rules are changing. I will have a longer pay back time on this investment under the preposed new rules limiting the adder rate to excess power only. The other rule that a system be within ten miles is nuts, the accounting that Green Mountain Powers does under net meter has nothing to do with distance.</p> |
| Gary Smith | Bristol | <p>We have just retired and are just finishing building our house in Bristol. In the spring we will be adding net metered solar. One of the reasons we are moving from PA top VT is because of the progressive and responsible commitment to make it possible for people like my wife and myself to move toward a clean energy future. ANY ACTIONS YOU MIGHT TAKE THAT WOULD INHIBIT THIS NECESSARY TRANSITION WOULD BE MOST DISAPPOINTING,</p> <p>Please protect net metering and continue to encourage the transition to affordable solar energy!</p> |
| Geoffrey Hoots | Corinth | <p>Net metering is important to clean energy and local generation. something can be done to offset infrastructure cost for local distribution</p> |
| George Carvill | | <p>I find it incredible that Vermont, a state generally lauded as fair and upstanding, would even consider renegeing on the commitment it made to its citizens and the commitments those citizens makes in response to the state's encouragement to invest in solar energy. We borrowed money to put solar panels on our house. Our decision -- and the bank's decision to loan us the money -- was based on the current net metering rules. Changing those rules now, retroactively, is not only unjust, it is immoral. Not to mention that it will probably cost the millions in legal fees to defend the class action suits that are sure to result.</p> |

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| George Gross & Barbara Wilson | Shoreham | <p>My wife and I own and operate a 4KW residential solar PV net-metering system. We are actively investigating expanding the system to supply over 3,000 solar kilo-watt-hours per year to support our forthcoming purchase of a Plug-in Hybrid Electric Vehicle. In the past, we have spearheaded a community owned solar cooperative project in our town and we have strong familiarity with the business model requirements needed to make it a success (our project was not built because of siting issues).</p> <p>We have recently become aware of proposed changes in the PSB Rule 5.100 that will adversely impact our planned solar PV system expansion and the future solar system investments of all Vermonters. I would like to elaborate on each of these proposed Rule 5.100 changes:</p> <ol style="list-style-type: none"> 1. The proposal to authorize the utility to charge additional fees on net-metering customers is extremely hostile to the future deployment of solar projects in Vermont. In the 150KW community owned solar project we were developing, the solar panel installed price was about \$850 and the net-metering benefit was only about \$55 per year after subtracting the cooperative's operating expenses as an annual membership fee per solar panel. Our business model did *not* sell Renewable Energy Credits to reduce these membership fees. Introducing any kind of utility fee in addition to the existing operational overhead could easily extend the recovery of a solar panel investment past 12 years. This utility fee will cause an inferior return on investment and it would halt Vermont community solar development. 2. As part of a solar project's inherently long-term return on investment period, there needs to be regulatory certainty that the net-metering credits and the solar project's associated operational costs will remain in balance throughout the multiple decade service life of the solar project. Allowing the utility company to change the net-metering benefits in mid-life of the project jeopardizes the economic stability of the project's ability to pay its expenses. The rules and net-meter rates known at the time the project is commissioned must be kept in force for the duration of the project's operation. 3. One of the major advantages a community solar project presents to a prospective member is the ability to relocate their residence to any other location within the utility's service territory and still receive their net-metering credits from their long-term investment in solar power. The proposed rule 5.100 restricting group-net-metering to those residences within 10 miles of the solar project directly sabotages this advantage of community solar projects. This proposed rule change also discriminates against those citizens who live in an area that is not and can not be near any suitable solar project site (e.g. many parts of our state have mountainous terrain) . You may have already recognized this issue from recent GIS maps published showing viable solar project land meeting numerous constraints: need solar exposure, proximity to 3-phase power lines, avoid wetlands, avoid prime Ag soils, avoid forested land, avoid view sheds, and many other local constraints. It is extremely likely that a large fraction of Vermonters will not be living within 10 miles of *any* viable developed solar project site. This proposed rule change should not be ratified. 4. The proposed Rule 5.100 also retires the "solar adder" on an aggressive schedule. Similar as noted earlier, this change if ratified by the PSB would further stretch the return on investment period of any solar project by 20%. In cases where community solar projects must recover their operational costs from their members, we could potentially see solar kilowatt hours generated without the "solar adder" costing more than ISONE conventionally sourced kilowatt-hours. This proposed Rule 5.100 change should be altered to extend the solar adder benefit to all solar kilowatt-hours generated from all solar projects commissioned until Vermont achieves greater than 70% of its electricity from renewable sources. <p>In summary, we are sharply disappointed that the spirit of the proposed Rule 5.100 is actively discouraging solar project deployments and community solar projects in particular. The PSB in its rule making decision should recognize that community owned solar projects have fragile business models with razor thin margins that determine the project investment's viability. We encourage the PSB to revise the proposed Rule 5.100 to reflect this information and encourage community solar project viability.</p> |
| Georgia Eltabbakh | Charlotte | This is absolutely not in the best interest of Vermont residents and businesses, and unnecessarily delay transition to clean energy. |
| Georgianna Gay | Pawlet | It is vitally important to keep net metering available! Encouraging renewable energy is our only sensible approach! |

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| Grace Gershuny | Barnet | Please register our concerns about proposed changes to the incentive program for net metering outlined in proposed rule 5100. While we understand that some adjustments to the program are needed, our recent decision to install a solar array for our home was predicated on our expectation that we could offset our 12 year loan payments by avoiding electric bills. If this expectation is not met as we transition to retirement it could become a big problem. Others considering this investment are likely to think twice before taking the risk of financial shortfall in later years. Please keep in mind the importance of making a transition to a more distributed and renewable energy system for the public good over the long term. Thank you for considering our comments, |
| Grant Taylor | South Burlington | Net metering is a huge benefit for solar project implementation. Renewable energy is becoming more valuable every day. Let's continue promoting solar energy production through net metering! |
| Greg Pahl | Weybridge | I feel that we should keep Vermont's net metering program strong, and should resist any changes that might weaken it, and I have several specific concerns about the draft rule. I understand that the so-called "solar adder" was intended to decline gradually over time, but feel that the new draft rule goes too far and too fast with that reduction. I also strongly disagree with the proposal to limit group net metering community solar participation to customers who live within ten miles of the project. This would seriously limit both participation and investment in the very type of mid-sized project that many observers say we should be encouraged if the state is going to meet its ambitious renewable energy goals in the coming years. Thank you for your consideration. |
| Gregory McHugo | Strafford | There is no time for weakness or concessions to the status quo. We need immediate and strong actions to reduce our reliance of fossil fuels. Vermont can lead the way. Please do what you can to enable the switch to renewable energy, by supporting reasonable net metering. |
| Gregory Moschetti | Dommerston | As a beneficiary of net metering I would hate to see the current system made less valuable to those who have committed to solar energy or those who plan in the future to commit to solar energy. Vermont's fossil fuel energy independence is an important goal we should all be working for--citizens, government, business and power companies. Please don't turn the clock back on solar power in Vermont. |
| Henry Swayze | Tunbridge | I would like to see group net metering stay strong with a generous business climate to work with in. I feel that projects that sell RECs could have restrictions on them as they are not adding to our renewable portfolio just using our solar space to allow out of state projects to continue to pollute all be it with an additional cost burden. |
| Hilarie Gade | New Haven | I support net metering |

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| Irene Wrenner | | <p>As a Vermont resident who bought into a Community Solar Array more than a year ago, I'm dismayed to hear that such a retroactive proposal has been made.</p> <p>Please do not lower the value of solar to Vermonters who've already bought into this renewable energy source, as well as those who'd choose to go solar in the future.</p> <p>As we're making great progress as a state toward our goal of 90% by 2050, why on earth would you considering adding a monthly solar fee as well as limiting group net metering (by people like me and my CSA co-owners) to a 10 mile radius?</p> <p>Please try to tune out whatever faction is encouraging such foolishness. I understand, first hand, that can be difficult; I'm asked to make difficult public decisions all the time.</p> <p>However, as someone whose held elective office locally for nine years, I know it can be done. You can put our people and the planet first. And I look forward to seeing you do so. Thank you!</p> |
| Islene Runningdeer | Barre | <p>Please keep net metering strong and viable. Many of us have not yet been able to switch to residential renewable energy (e.g. solar power) because of financial restrictions. I still plan to do this as soon as is possible for me, but don't make it harder for us to do so. This switch must be made.</p> |
| Jack Clay | Middletown Springs | <p>The current Net Metering rules have significantly supported Vermonters' interest and willingness to move toward solar systems. This is without doubt. I am very concerned that the proposed new rule will undermine that support and reduce the incentives for Vermonters to continue to move toward a zero carbon energy supply.</p> <p>Specifically, I am strongly opposed to any rule that</p> <ul style="list-style-type: none"> - undermines the move toward community solar systems. [Vermonters currently import electricity from Canada, why does it matter how far away a solar farm is from its owners?], - will undermine the investment that many Vermonters have already made in solar systems, and - allows utilities to change the basis upon which solar system investments have already been made. <p>Instead of seeking to reduce Vermont's strong support of renewable energy sources the Vermont _PUBLIC SERVICE_ Board should be acting in the interests of the public, and not the energy industry, to promote greater investment in renewable energy sources.</p> |
| James Burde | Jericho | <p>It is essential that our State do everything it can to maintain its example for supporting clean power and renewable energy goals. To this end we need to keep Vermont's net metering program strong and viable by building on the success of net metering, and not by enacting the draft rule that would make it harder and more expensive to go renewable.</p> |
| Janice Solek-Tefft | Underhill | <p>Please reconsider these proposed changes that will NOT be beneficial to consumers. It seems again the need for sustainable resources are only benefitting the big energy companies! Why should consumers be penalized for doing the right thing? Rethink this and let's work to make all of Vermont a sustainable state.</p> |

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| Jay Frater | Monkton | <p>As a solar homeowner, the idea of retro-actively changing the value of the solar credit I get from my utility and adding a new fee is unfair and would be quite painful.</p> <p>My wife and I are paying for our solar system in fixed monthly payments to ensure that going solar won't affect our monthly budget. We made a financial decision to invest in clean energy under the existing rules. I urge you not to pull the rug out from under us.</p> |
| Jayne Nold-Laurendeau | East Calais | <p>I am ready to put my Solar panels up, but when I was ready the electric company will not allow it. I have bought an electric car and want to use solar power to fuel it. My car usage is mostly short trips that only use electric power. Please have Hardwick Electric Open to netmetering</p> |
| Jean Pollock | Newfane | <p>We should be building on the success of net metering, and their draft rule instead would make it harder and more expensive to go renewable. Support net metering!! Don't go backwards. That's not what Vermont is inherently about!</p> |
| Jeff Cohen | Warren | <p>Net metering helps all parties involved. The utilities get Solar customer's energy during the day when the Demand for energy is the greatest. The energy is charged to their customers at a premium rate!</p> <p>Next, the power companies keep all the electricity, and sell it to their customers, that is beyond the consumption of the net meterers. The net meterers do not get paid for this excess electricity.</p> <p>With net metering we are promoting renewable energy and hence burning less fossil fuels, nuclear etc.</p> |
| Jeff Margolis | Vergennes | <p>I'm writing to suggest to you that proposed Rule 5.100 is a step backward in Vermont's pursuit of renewable energy. Net metering is an attractive model for going solar, and lowered costs and barriers help make it attractive.</p> <p>Rule 5.100 doesn't seem to acknowledge that the transition to solar is both vital to our shared green mission or that it needs support, not red tape. Please consider a fair, long-range vision that secures our energy future.</p> |
| Jeffrey Haslet | Williston | <p>More net metering!!!!!!!!!!!!!!</p> |
| Jennifer Kimmich | Stowe | <p>Net metering has allowed us to invest in a local solar power farm. The energy generated by this farm is equivalent to the amount of power we use to keep our brewery, The Alchemist, running. This investment is good for Vermont. Not only does it bring more renewable and clean energy to Vermont, it also keeps money in our state that is critical for the long term sustainability for our businesses and our economy. Our solar panels were made by a Vermont company. Also, the land owners who lease their property for the equipment get paid a fair amount for having the panels on their farm. We are proud to keep as much money in our state as possible. Any legislation that makes it more difficult and/or more expensive to go renewable in Vermont is absolutely negligent and short sighted.</p> |
| Jenny Daudlin | Williston | <p>My family just went solar in 2015 and I can't believe that there might be a new charge added to my bill BECAUSE of having gone solar. I understand that as renewables on the grid increase policy will need to change but it feels absolutely inappropriate to change the policy that we understood we were signing onto. For many families in a tighter place financially than we are I could see this being really hard on them and unfair.</p> <p>We were considering increasing the size of our solar system but now this makes me think that it won't be advantageous to do that, and it won't make sense to new households to go solar either.</p> |

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| Jeremy Berube | Essex Junction | <p>With residential utility customers finally having access to alternative sources of clean energy it is no wonder that some utilities are experiencing some discomfort as their previously unchallenged business practices are experiencing some competition. The current net-metering plus adder system that is in place not only makes going solar economically viable for homeowners but also allows them to, for once, get a fair deal from the utilities that have held them captive for years. Were it not for the Public Service Board it is likely that Vermont's rates would mirror those throughout New England.</p> <p>While some utilities seem to be embracing this change in energy production and positioning themselves to change with it, others are so stuck in their ways that they are creating fallacious arguments so that they continue to do business as they always have. Utilities seeking to eliminate the adder and charge additional fees to solar customers are transparent in their attempts to undermine the adoption of this technology by Vermonters. Net metering benefits both the homeowner and the utility as excess energy is fed into the grid during times of peak production which coincide with peak load demands. The problem some utilities have is that, while they do realize a profit and some cost savings, they have to credit the homeowner at a higher rate thus cutting into their profit margins. The argument that their fixed costs need to be met, while valid, is greatly exaggerated to the extent that it is misleading.</p> <p>I believe that residential solar installations should continue to be able to net meter with the addition of the adder. This will give Vermonters the option to produce their own clean, renewable energy while also realizing a modest financial benefit. In the case of community solar arrays, while I do believe that they should be constructed in close proximity to the structures they will be powering, 10 miles is perhaps too restrictive. Finally, I believe that any additional fees charged specifically to solar homes by utilities constitutes retaliation and should not be allowed. Practices such as these are contrary to Vermont's renewable energy goals.</p> |
| Jerry Bird | Bennington | <p>I have been working on community solar for the past year and we have been approved for a 90kW system which involves 20 members. Funny thing is when we got most of our ducks in a row families and business started piling on, so we expanded. As a group we want the state to receive credit for the 90 by 50 initiative and we are a volunteer group who is passing all our savings on to members. We are even pursuing the possibility of a cooperative model that could include lower and moderate income families that may not be able to benefit from our community model.</p> <p>Our Net Metering laws are out in front of every other state, it would be a travesty for you to throw us back in the pack when we are leaders in almost every front here in Vermont. Please encourage us to move forward on every front Solar, Hydro and Wind. Please don't build in any speed bumps or road blocks that will increase expenses or slow down our growth toward renewables.</p> |

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| Jessica Edgerly | Barre | <p>My husband and I went solar a couple years ago, as part of a series of investments in our starter home. I understand from these draft rules that we would earn less in solar credits from our array and have to pay a new solar fee to boot. That just doesn't work for the finances of our family.</p> <p>First and foremost, this seems incredibly unfair. We pulled a zoning permit for the rest of our renovations; our city building inspector can't come back and tell us to undo our work because of future changes to our zoning ordinance. Similarly, we made the financial decision to go solar with the belief that we knew the rules and that they weren't going to change.</p> <p>Next, we just can't pay more for energy. With a 6-month old at home, any disposable income we did have is now eaten up by daycare costs. We knew this was coming: we installed a wood stove and stacked a couple years of wood, and converted our electrical needs to solar. Don't undo our good financial planning now.</p> <p>Last, we were able to invest in solar because it was a good financial decision and because we love producing clean energy on our roof. Both had to be true for this to work for us. Changing our state's net-metering rules to make solar more expensive and inaccessible in the midst of our current climate crisis seems backwards to me. I urge the rules be changed reflect our state's vision for clean energy growth.</p> |
| Jim Antel | Norwich | <p>The current Net Metering is a key reasons why we recently bought a home in VT. Rule 5.100 contemplates changes to Net Metering that will significantly reduce Vermont's appeal both to new home buyers and to anyone who has environmental concerns. The restrictions on group net metering are ridiculous - this is an opportunity that should be INCREASED. The terms for customers after 2017 should not diminish benefits - the current arrangements should be extended indefinitely into the future. Finally, the provision allowing utilities to tack on an additional fee makes no sense. VT should be pioneering the opportunity America now has to fully sift from fossil fuel dependence to renewables. Such a fee is 180 degrees in the wrong direction.</p> <p>Leadership is what Americans and Vermonters need... leadership that backs laws that shape a viable, thriving society 7 generations ahead.</p> <p>Please - show that kind of leadership.</p> |
| Jim Manchester | Charlotte | <p>We have had a solar system providing all of our electrical needs for the past four and a half years. Solar is the way to go and net metering is important for the state and independence of its residents.</p> <p>Please continue supporting our efforts at carbon neutrality and freedom from reliance on oil.</p> |

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| Jock Gill | Peacham | <p>The goal should be to maximize the adoption of solar energy for economic, social and environmental benefits.</p> <p>The question is why is the PSB putting up barriers to expanding solar energy as quickly as possible? For example, the PSB could be championing the idea that every single Vermont town should have a Town Solar Array such that every citizen could participate in the full spectrum of solar energy benefits.</p> <p>The PSB could also encourage businesses without appropriate roofs for roof installations, or adjacent lands for ground mount systems, to participate in community solar arrays that are properly sited within a generous geographic distance of their business. How else can a business in St. Johnsbury, for example, enjoy the business benefits provided by solar energy. Certainly the PSB does not want to establish anti-business regulations?</p> <p>Thank your for your time and consideration.</p> |
| Jody Andreoletti | Montpelier | <p>Please put your policy power into making renewable energies more affordable and prolific in Vermont -- policies that put obstacles, or *perceived* obstacles, in front of Vermont consumers, or reduce the incentives for more people to invest in renewable energy slows down the progress of Vermont as a leader in the new world order of energy creation and consumption. Give Vermont and renewables more time to build and grow before you start considering capping or reducing incentives.</p> <p>And if policies are driven by the need for money, look towards those in positions of authority -- instead of making everyday Vermonters pay more, maybe people in power should get paid a little less and start evening out the inequality between everyone. Everyone else would rather have affordable renewables.</p> |
| John Fedor-Cunningham | Orwell | <p>Please improve net metering, do not destroy it!</p> <p>Do not end the renewable credit for EVERY KWH generated!</p> <p>DO NOT LET UTILITIES CHARGE A FEE to customers who install renewable energy --- This is completely crazy! This is like letting a bus company charge you a fee for not taking the bus!</p> <p>We must support and enhance renewable energy, not discourage it!!!!</p> <p>If anything, you should be expanding the renewable energy credits for each KWH generated!!!</p> <p>Global warming is getting worse and worse. It's time to enhance support for renewables, not reduce it!</p> <p>Vermont is not some southern red state --- it's truly insane to even consider charging a fee for net metering customers and I am ashamed of Vermont for even considering such an outrageous anti-environmental action against the citizens of Vermont.</p> |

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| John Graham | Rochester | I feel these proposed changes to the current net metering regulations will do far more harm than good, and are driven by short-term needs rather than the long term strategy we need to create energy systems that will not compromise the environment and be capable of fueling society's needs instead of the bottom line of oil cartels and their subsidiaries. These changes suspiciously resemble legislation funded and sponsored by energy companies in Nevada and Arizona, which seem designed to cripple the solar industry by making it harder and more expensive for people to invest in this technology. It is my understanding that Green Mountain Power has been happy with the results of the current net metering system and have not requested these new parameters. In my opinion the current system is a win win situation for individuals and communities seeking to reduce dependence on fossil fuels and the damage they cause, and replace their use with a viable energy supply. |
| John Hamerslough | Richmond | Please PUBLIC Service Board. Remember you also represent the people of Vermont Not only the Utilities. Please do not weaken the net metering rules and subjugate those towns and individuals that already have invested in solar energy to create a cleaner and cheaper energy for the electric companies who have made a deal with us to pay us for the electricity we give back to them so that they do not have to pay a higher price for energy from other sources. We the people expect YOU to look out for OUR interests and protect the agreements that electric and gas companies have advertised and signed and that they should not be able to slip through some legal loophole to shrink the amount these companies should pay us or be charging the people of Vermont. |
| John Morris | Marshfield | A 10-mile radius for group net metering is much too small. I need to be able to group net meter with my children, who live more than fifty miles away. |

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| Jon Miller | Charlotte | <p>Please keep Vermont's net metering program strong and viable. It's of vital importance to helping our state continue to lead the way nationally in transitioning to clean energy.</p> <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |

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| Jonathan Corcoran | Bristol | Homeowners and businesses need certainty over the life of our investments in solar if we, as a state, wish to transition our energy infrastructure to renewables! |
| Joseph Dorwart Crane | Montpelier | It is a TERRIBLE idea to enact retroactive rules to people with solar. I just signed up for a community solar array and this would make me pay far more for electricity than I was before. Saving money was the primary reason I signed up for solar. Since when is it okay to retroactively change rules on people who have invested LOTS of money in a long term (25-35 year) commitment? |
| Joseph Kaszas | Morristown | Please make solar energy viable for all Vermonters !! |
| Josie Jordan | Lincoln | <p>I am a solar homeowner, and I find this proposal to more than unfair! We made the decision to put in solar panels in order to save money and be environmentally conscious. Part of our decision was the solar credit that was available in 2012. The idea of retro-actively changing the value of the solar credit I get from our utility and adding a new fee is outrageous. This would feels punitive and would be quite painful.</p> <p>We made our decision under the existing rules. We can't afford to have higher utility bills as we just started a new business. Please do not support this proposal. It would be like pulling the rug out from under us!</p> |

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| Judith Hzelton | Bennington | <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |
| Judy Bellairs | Hardwick | <p>I just reviewed your proposal to change solar net metering in Vermont and am extremely disappointed that you would consider putting in place all of these disincentives to install renewable, non-polluting solar energy systems. We strongly oppose 1) reducing the value of net metering to solar customers, 2) reducing guaranteed rates to 10 years and 3) charging an additional fee for net metering customers. Seriously?</p> <p>Our local power company keeps complaining that net metering costs them about \$800 per solar customer per year. If that is the case, then fix the problem with the system--don't punish the people who are investing thousands of dollars to do the right thing.</p> <p>We have a solar array on our garage. We're making monthly payments on it, and we're certainly not making a net profit on net metering. This proposal is reactionary and short-sighted. Please come up with something better.</p> |
| Judy Geer | Morrisville | <p>Please do NOT weaken net metering. It's been a powerful tool in encouraging more people to install solar panels! This progress needs to continue if VT is going to meet its energy goals.</p> |
| Julie Zack | | <p>One of the reasons our young family recently moved to VT was its progressive action supporting renewable energy. The proposed changes to VT's net metering rules will make it more difficult for families like ours to invest and benefit from local solar energy generation and support the local clean energy economy.</p> |

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| Kathryn Blume | Charlotte | <p>I'm writing to express concern with the status of your current proposed update of Vermont's net metering program.</p> <p>This has been an incredibly successful program, and your rules as they stand would make it harder, not easier to develop solar energy in our state.</p> <p>You've short-changed the value of solar power by dropping the adder too quickly and by too much.</p> <p>The geographic restriction of 10 miles would exclude many Vermonters from participating in net metering projects. In fact, I had I not already been signed up for a project, it would exclude me from the one I'm currently in.</p> <p>Speaking of which, the rule would upset the expectations of current participants (such as myself) around the stability of our investments. I expect to be a part of my program until I step away from it, and would prefer not to be buffeted by the winds of political change.</p> <p>I'm also pretty appalled by the idea that utilities could charge an additional, unspecified fee for net metering customers. I mean, think about it. You'd allow me to be charged more for my attempts to get off fossil fuels and do the right thing for both myself and the planet.</p> <p>Would you allow me to be charged some additional unspecified amount for my propane? It's absurd!</p> <p>Climate change is accelerating, fossil fuel companies are starting to go bankrupt, and you should be making access to renewables easier to manage, not more difficult, costly, and unpredictable.</p> <p>And by the way, you should also NOT be building out additional fossil fuel infrastructure projects, but that's a topic for another day.</p> |

Public Comments Re: Rule 5.100 Draft, January 13, 2016

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| Kathy Knauer | Burlington | <p>As a solar owner, the idea of retro-actively changing the value of the solar credit I get from my utility and adding a new fee is unfair and would be quite painful.</p> <p>We're paying for our solar system in fixed monthly payments to ensure that going solar won't affect my family's monthly budget. My wife and I made a financial decision to invest in clean energy under the existing rules. I urge you not to pull the rug out from under us.</p> |

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| Keith Bellairs | Hardwick | <p>As a homeowner who has recently installed a small solar net-metering plant, I have a few concerns about the proposed changes in Rule 5.100. The PSD memorandum of December 15, 2015 to the "Act 99 list" lists a few changes, among them:</p> <p>The rule allows utilities to collect reasonable fees to pay for the maintenance of the electrical grid.</p> <p>The rule modifies the financial incentives to encourage the installation of net metering systems.</p> <p>What is unsaid is that the "reasonable fees" can work as a substantial disincentive for net-metering and that the modification to the financial incentives is a reduction of the incentives.</p> <p>1. Uncertainty and instability of pricing for retail power customers. Even a small plant is a substantial investment that must be costed out over 20 or 25 years. Purchases are made based on the costs and incentives at the time and the prospect of stability. 30 VSA 219a recognizes this, for example, by setting a floor for solar energy credits.</p> <p>5.103(B) grandfathers existing customers subject to tariffs in effect as of December 31, 2016. Thus companies are given the year 2016 to race to change their tariffs. And no assurances of any kind are given to customers who install after January 1, 2017. The denial of grandfathering against further tariff changes seems to explicitly violate 219a (h)(1)(K)(v) which specifies the amount of solar credit notwithstanding changes in tariffed rates.</p> <p>5.105(A) currently requires electric companies to provide the solar energy credit required by 30 VSA 219a (h)(1)(K). Strangely this statutory requirement is removed in the Draft 5.105(A) thus appearing to reverse the legislative requirement that solar credits be given for each KWH generated.</p> <p>5.107 (A) (5),(6),(7), and (8) of proposed rule, allowing electric companies to add unspecified charges effectively introduces an element of uncertainty that makes it impossible to even estimate the future costs of the installation and exactly reverses the current rule prohibiting such charges. Incidentally, imposition of these charges on installations of less than 15 KW exceeds the authority granted to the PSB under 219a (h)(1)(E).</p> <p>2. Acquiescence to electric companies attempts to remove incentives for solar generation. Local electric companies see that they are being asked to carry the entire burden for the net-metering program. They already seek to discourage it as much as they can. For example, the cost of installations in our area can be raised by several hundred dollars by a completely pointless requirement with respect to location of the production meters. There is no economic value, but it may cause some potential customers to turn away from a project.</p> <p>5.107(A)(3) currently allows the electric company at its own expense to install additional meters. The draft would allow these additional meters at the customer's expense.</p> <p>My electric company and others in the state complain bitterly (and with some justification) that they are being required to subsidize the net-metering project. They make the case to our neighbors and -- as the changes to 5.107 show -- to the PSB that small solar projects are freeloading off of ratepayers who rely on the grid. To that end they seek disincentives to discourage net-metering projects. Loading on a variety of unpredictable "administrative" charges effectively undoes the legislative intent of 219a</p> |

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| Keith Epstein | South Burlington | <p>I am writing in regards to the 12/7/15 proposal for net metering, rule 5.100. There are some aspects of it that I think negatively impact Vermont's ability to meet our 90% renewable energy by 2050 goal, and therefore should be revised. We need to keep encouraging installation of more renewable energy, not making it more expensive and difficult for homeowners and business owners to go solar.</p> <p>1) solar adder: I think solar customers should receive the solar adder for every kwh generated, not just kwh beyond their monthly usage. A homeowner or business that is very energy-efficient should be able to receive the same benefits that a very inefficient homeowner could receive.</p> <p>2) 10-mile radius: There seems to be no fact-based reason for this limit. The effect will be to make community solar more expensive and difficult, which will slow the pace of solar adoption. This seems counter to Vermont's renewable energy goals. Community solar strengthens Vermont's economy by allowing everyone to go solar, and keeping much of our energy dollars within the state. My suggestion is to eliminate the distance criteria.</p> <p>3) unspecified fees: It is unreasonable to not specify with any certainty how much a utility may charge net metering customers. Without some sort of cap or predefined fee, the fees may turn out to be so high as to discourage investment in renewable energy. If recovery of fixed costs is the goal, my suggestion is to raise the daily access charge for all customers so it more accurately reflects the fixed costs of operating the electrical infrastructure.</p> <p>Thank you for your consideration.</p> |
| Kieth Dewey | Weston | <p>We should be building on the success of net metering, and your draft rule instead would make it harder and more expensive for Vermonters to go renewable in the future. It is insane to move away from making the conversion to renewables like solar EASIER each year with every new regulation while being under the directive mandate from the citizens to reach 90% renewables by 2050. For those of us have already done the financial, energy and environmental planning and implementation to move to solar energy it is outrageous that the PSB would reduce my production benefits in any way whatsoever. You should be finding ways to INCREASE the rewards to us early adopters, not retract our benefits!</p> <p>This draft rule is disgraceful and counter to the proper overall path of our state, country and planet. Stop listening to all of the NIMBY idiots who complain about everything that crosses their plane of vision and help us who are trying to help the common sense "public good" for Vermont and beyond. I made the tedious and delicate financial decision to go solar based on the fact that the PSB would hold to their commitments over the long-term. I bought my system back when the installed cost per watt was significantly higher than it is now, knowing I was taking a hit to do the right thing and be an early adopter. My "grandfathered" reward should not have any term at all! Now this slimy draft rule stands to punish us who did the right thing, instead of increasing the rewards to us pioneers who cared most about Vermont and the planet. This nonsense will set a precedent and send a message to all future renewable energy producers that the PSB cannot be trusted to have their back or actually act the public's best interest. If the PSB is bound by Vermont law to work to comply with the set energy plan goal of reaching 90% renewable energy production by 2050, how could this draft rule be seen as anything but a negative obstruction to that legal REQUIREMENT. It's all rather simple... reduce benefits to the bad stuff and increase the benefits to the good stuff. Please take this draft rule and throw it away, start over and DO YOUR JOB to make our net metering rules better and more beneficial, not worse. This draft rule tells me the PSB is not serious about how to get to 90% clean energy by 2050 at all. What a disgrace...</p> |

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| Lee English | Grand Isle | <p>I am writing to let you know that I support a strong net metering program. My concern with the updating of this program is language that falls short of assuring all Vermonters the affordability of going renewable. This is reflected in the value for solar falling short, making community solar more expensive and less available, questions of how stable is the net-metering and the added unspecified fee for net metering customers.</p> <p>Please build on the success of net metering and your draft rule rather than making it harder and more expensive for Vermonters.</p> |
| Linda Gray | | <p>1) The draft proposal for new net metering customers to receive an adder for only their excess power will mean a 20% drop in what many customers get for their solar power. This is too precipitous, and would slow the deployment of distributed solar just when we need it to go in quickly.</p> <p>2) The 10-mile radius limit for group net-metered customers seems arbitrary and odd. What is the reason for it??? It should be dropped.</p> <p>3) The draft proposal allowing for an additional, unspecified fee by utilities for net metering customers is way too vague. Go ahead and identify reasonable charges to net-metering customers for their use of the grid as the battery for their solar power.</p> <p>4) The rules MUST ensure that customers who make a personal investment in renewable generation (thereby helping the state and the utility to meet important mandates) can legitimately say that they are using clean electricity.</p> |
| Linda Sukop | Burlington | <p>I understand that your draft rule would make it harder and more expensive for Vermonters to go renewable. We should be building on the success of net metering. The value for solar falls short. The rule proposes restrictions on group net metering that will make community solar more expensive and less available. It would create significant uncertainty for all net metering customers. Utilities may charge an additional, unspecified fee for net metering customers, driving down participation. Please keep Vermont's net metering program strong and viable!</p> |
| Lisa Laberge | Dorset | <p>Vermont has been a leader in renewable solar energy. Please help us continue this success by keeping net metering strong. Vermonters have embraced solar energy due to our net metering rules. Thank you.</p> |
| Louis Cox | Charlotte | <p>Net metering has encouraged the necessary shift away from unsustainable reliance on fossil fuels. Let's not place unnecessary impediments to this very successful and vital transition.</p> |
| Louise Rickard | Lincoln | <p>As an owner of a solar panel, I have been a net-metering customer for over 5 years. I entered into this agreement under CVPS and it seemed a positive way for us and our neighbors to do our part to limit fossil-fuel use and encourage solar electricity generation. Since CVPS was bought out by GMP, I have lost the convenient feature of having my net-metered neighbors' usage on my bill so that I could bill them directly to help me off-set my lease cost with All Earth Renewables.</p> <p>We made the decision to go solar and to continue to lease the panel in good faith that it would be a positive step toward less dependence on fossil fuels. Nothing should be done that discourages or undermines the net-metering option. We should be building on the success of net metering rather than making it harder and more expensive to go renewable.</p> |

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| Lucas Cady | | <p>My wife and I invested in solar a little more than a year ago so we could do our part in greening Vermont and building a sustainable future. A large part of that decision was the net metering rules we took advantage of.</p> <p>Changing these rules would certainly negatively affect the impact our solar system has made on our finances, as well as discourage others from investing.</p> |
| Lucinda Belinger | Bristol | <p>To the members of the Vermont Public Service Board:</p> <p>Information regarding the draft rule for the net metering program update is concerning. There are some issues that I believe will discourage people from investing in net-metered renewable projects and may hurt existing customers by changing the rules under which they invested in their systems. Specifically:</p> <p>The "adder" will be significantly reduced, resulting in fewer Vermonters choosing renewable solar power.</p> <p>The 10 mile restriction would exclude many Vermonters from investing in community solar.</p> <p>The utilities monthly fee for the right to go renewable will certainly make customers hesitate to participate.</p> <p>Rules and rates that can change without caps can hurt existing customers and discourage others from investing.</p> <p>I hope that the board will consider the success thus far of net metering and will draft a rule that will encourage net metering by making the process as easy and inexpensive as possible.</p> |
| Lucy Gluck | Burlington | <p>I support growing solar and other renewables in Vermont because we MUST FACE the CLIMATE CRISIS now! Please reconsider these net metering rules that will only take us backwards.</p> |

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| Lynn Murrel | South Woodstock | <p>I wanted to make some comments on the Draft Revisions to the Vermont Net Metering Regulations before your deadline.</p> <p>One issue of particular concern to me is the restriction of the area from which property owners can participate in a community solar array. A ten mile radius could mean that property owners might not be able to participate in an array in their own town, not to mention adjacent towns. I don't understand the need for any restriction on any state property owner, but certainly not a ten mile radius. There are no infrastructure requirements for accommodating distant participants. In Woodstock we have few suitable sites and would like to be able to collaborate with surrounding towns to find the best sites for community arrays. There is also the problem that in some parts of the state there might not be enough interested property owners within a ten mile radius to make a community array feasible. Inviting owners from adjacent towns to participate could make a project viable. This proposed requirement would certainly curtail the development of community solar.</p> <p>Another concern of mine is the elimination of the solar adder. This would reduce the economic viability of home or community arrays for many Vermonters. I think this issue needs to be studied carefully to see if there isn't a middle ground, fair to all, something between the current system and the meager benefit of the proposed Excess Generation Credit.</p> <p>I would also like to encourage you to act favorably on the request for an extension of the net metering cap by GMP. GMP has been a leader in accommodating net metering customers and I wouldn't want the current cap to prevent more Vermonters from participating.</p> <p>Thank you for considering my comments,</p> |
| Marcia Bushnell | Bristol | <p>Promote, in every way solar and wind power initiatives to encourage Vermonters throughout the state to invest in solar. Vermonters are a shining example for others. Do the right thing for the planet.</p> |
| Marianne Kelly | Bradford | <p>It's imperative to this state and its people that you keep this viable!</p> |
| Marina Meerberg | Stowe | <p>Please keep net metering as a means to stimulate Vermont's transition to clean energy. Climate change is already here and we must pull out all the stops to transition as quickly as possible.</p> |
| Mark & Mary McGrath | Greensboro Bend | <p>I can't think of a better way to kill the widespread interest in net metering than certain provisions in the proposed rule changes.</p> <p>There should be no monthly fee for net metering customers. The argument that net metering customers are not paying their fair share of line maintenance costs is spurious, and no more true than rural+C99 customers should be charged more than urban customers. Since it is much more expensive to maintain lines for a few customers per mile than many customers as in a urban setting, the same argument could be made that all rural customers are not paying their fair share.</p> <p>The value for solar falls far short. We have solar at our home, and if we wanted to make money we wouldn't have invested in our solar systems. The purpose of net metering should be to encourage individual homesteads to create their own solar. To encourage individuals to buy into solar for their homes, there has to be some financial incentive, meager though the existing one is.</p> <p>The unspecified fee which utilities could charge should be dropped entirely. If there were such fees, sooner rather than later, and specifically when batteries become strong enough to provide several days backup such as Tesla and many others are working on, there would be an incentive to leave the grid entirely. This could result in a large outflow of customers from our utilities.</p> |

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| Mary Alice Bisbee | Montpelier | Please keep net metering as it is to help all Vermonters. The suggested draft changes will hurt low and middle income Vermonters most, particularly. Keep climate change from eating away at everything we hold dear! |
| Mary Metcalf | Panton | I support a robust net metering program that continues to facilitate Vermonters' transition to affordable renewable energy/production, including allowing net metering customers to get full value (the retail rate and "adder") for every kWh generated by their system, a credit that remains the same over time, no monthly fees for net metering customers, and eliminating restrictions on group net metering from your proposed rule. Thank you. |
| Matt Grady | Burlington | As a solar owner, the idea of retro-actively changing the value of the solar credit I get from my utility is unfair and would be quite painful. My wife and I made a financial decision to invest in clean energy under the existing rules, and have budgeted our long term finances based on them. I urge you not to pull the rug out from under us. We made the decision to install solar at our home because we're working on reducing or eliminating expenses as we head into retirement. That decision would be undone if you change the value of solar retroactively. We can't afford for the rules to change as we head into retirement. |
| Melinda Moulton | Huntingdon | This is insane that the Vermont Public Service Board would do anything to affect the net metering program - I just invested \$65,000 in solar panels for two houses - Solar is a LONG TERM investment - Vermont must stay on top of this for the next generation and next generation and next generation - we cannot falter!! Support Net Metering and keep our Renewable World moving forward!!!! |
| Michael D McCarthy | | I'm a member of a community solar array and I strongly oppose any retroactive change in net-metering policy. My wife and I made the decision to enter into a 20-year solar agreement because we thought that the net-metering credits would be predictable for that period. Making retroactive changes to net-metering rates would upset the budgets of thousands of Vermont households like mine. I urge you to be very careful when considering changes to our successful net-metering program that would create doubt and uncertainty about the value of solar in our state. Changing the rules for existing net-metered Vermonters is incredibly unfair. |

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| Michael Doran | Vergennes | It looks like your draft rule would hinder the growth of renewables in the State by making it harder, more expensive for individual people to use net metering. What will this bill really be about if it makes it harder to do this? Obviously it would not be in the public's best interests. Please reconsider and edit this draft bill so it continues to encourage expansion of renewable energy in our state and continues to offer net metering in its current availability for the public to do it. Thank-you. |
| Michael Fannin | Middletown Springs | Our decision to invest in a net metering system was contingent on a stable future expectation in respect to agreements agreed to by the power companies, state regulators and ourselves. Your proposed changes to this environment shift the advantages we expected and skew our financial stability. We are not wealthy and our circumstances have diminished since we built our system. It hardly seems fair to us, to be moving the goal posts at this late date. Please remember that you are called the PUBLIC Service Board . Don't betray the public trust. |
| Michael Kiess | Thetford | <p>Thank you for the opportunity to comment on proposed changes to Rule 5100. I am writing as a member of the Town of Thetford Energy Committee, which is actively working on group net-metered projects to meet the energy needs of the Town, residents, local non-profits, and businesses. The proposed 10-mile proximity requirement, 5.106 (A) (1), for meters to be included in a system would prevent our projects, because it would exclude many of our interested participants and beneficiaries, particularly the town and non-profits.</p> <p>I strongly suggest removing the proximity requirement, and to continue to allow participation of all meters in the electric company service territory. Additionally, the % cap on net-metering capacity 5.107 (A) (1) creates doubts about the feasibility of our projects. I suggest reduction of incentives after a certain % of net metering capacity, rather than a limit on interconnection. Thank you for your service,</p> |
| Michael Sacca | Tunbridge | KEEP NET METERING!!! |
| Nathan Crain | Killington | think it is unconscionable that at this point in climate change we re discussing slowing VT's move into renewables by making it more difficult for Vermonters to generate solar energy. We need to create a good long term plan for INCREASING renewables, not restricting them. |

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| Nicolas Landry | Barre | <p>Vermont has a proud history of being community driven and pragmatic. These are the very characteristics that can be used to help us transition to renewable energies. I have worked in and around residential weatherization retrofits for four years. During this time I have found that home owners from all over state want to be responsible to the environment but will not do so if the cost is too great. Receiving retail value for for every kWh generated is a very effective incentive that offsets the instillation cost of a solar system.</p> <p>Installing a solar system is a long term investment, equivalent to purchasing a house. Vermonters need to know the facts for years to come before they can be comfortable with investing in such a system. A vague rule with unspecified costs and deadlines wold serve as a hurdle to those interested in investing in a residential system.</p> <p>Vermont is a strong state because it is made up of strong communities. There are many cases in which people want to invest in a solar system but do not have an appropriate sight in their property. There are those who have ideal sites but lack the means to use them. Group net metering is an effective mechanism for address this mismatch. Group net metering allows communities to work together to generate their own power. Throughout our state history there are disasters that were overcome by communities coming together to help one another. Group net metering is simple one more example of what can be accomplished by a Vermont community.</p> <p>Rule 5.100 does well to address the issue that we face as our state transitions to generating renewable energy. Let us not lose sight of the goal to find effective ways to make that transition. I ask that you look at the issues above, concerning cost effectiveness to the home owner and group net metering, before moving forward with this draft.</p> <p>Thank you for your public service.</p> |
| Nicole Anderson | Middlebury | <p>Please don't make it harder and more expensive to convert to sustainable energy. My husband and I are considering making changes soon and the initial investment is prohibitive enough with out adding more costs. Thank you.</p> |
| Nicole Morris | Williston | <p>To me going solar was an entirely financial decision. I'm an analytical person and kept questioning the numbers I was given – but given the current net metering policy and solar credits, going solar is working for my family. There's no question that I am seeing a financial benefit since I created an ROI table that demonstrates the payback period for my solar installation. When deciding if I could afford solar and the 12-year solar loan, I determined that given the net metering policy I could expect a 10-year payback period. This of course changes if the rug is pulled out from under me. Given the Federal Solar Investment Tax Credit being renewed, it's clear the Federal government believes the solar industry is in its infancy and homeowners could benefit from incentives. So, too, the state level should recognize the benefit of our own state policy: net metering. The motivational factor to go solar was financial and seeing that month-to-month accumulation of solar credits on my bill reminds me I made a good decision. A change to that policy doesn't live up to what I signed up for.</p> |

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| Nils Behn | Waitsfield | <p>I would like to reiterate my STRONG support for the positions VPIRG has brought forth regarding some of the provisions in the draft 2017 Net Metering Program. Specifically I would like to express my opposition to the following changes to the current net metering program:</p> <ol style="list-style-type: none"> 1) Application of solar adder only to excess generation 2) 10 mile siting requirement 3) Elimination of the 10 year grandfathering provision (we believe this is not within the boards legal authority to modify this provision) 4) Charging a net metering fee <p>I appreciate your consideration of my comments.</p> |
| Norman Levy | Norwich | <p>While the proposed draft guidelines have several positive components, like emphasizing siting in brownfields and parking lots, they have several components which excessively disincentive solar development at the local level, where maximum economic benefits can be exerted. The only rationale for reducing incentives is upward pressure on utility rates for all Vermonters. And that pressure should be imminent, not theoretical and modeled. Further, responses to such pressures should be stepwise, and as small as possible.</p> <ol style="list-style-type: none"> 1. The proposals for reducing the solar adder in number, 2 cents/KwH, as well as limiting it to “excess” production, are, in reality, to eliminate it. Most rooftop solar installations are created to yield 0 electrical cost over the year. So unless that changes, there is excess only during the summer months, and the solar adder benefit is paltry. It is also insufficient to encourage local community solar, again because the benefits are so minimal. 2. The limit of solar parks to 10 miles of town borders is presumably to reduce grid transmission costs and to promote truly local community solar parks, but the number is arbitrary and illogical in a setting of net metering. If grid costs are really stressed, then have developers pay the grid costs as a component of approval. Further, these rules totally ignore the regional siting plans that have been authorized by the Public Service Department, as well as the state 5 year development plans. Why plan if rates are determined by an independent process. 3. Limiting the size of solar developments. Do you think the planet cares? Let regional governments, in collaboration with the PSB, decide on size and location. |
| P. Tower | Barre | Keep solar free and accessible to those wishing to reduce their impact on the environment. |
| Pam Knights | | <p>As a new solar owner (as of Sept 2015), the idea of retroactively changing the value of the solar credit we receive and were led to believe that we will receive on an annual basis from our utility provider, and then possibly adding a new fee on top of that, is simply unfair and will negatively impact our household budget. It will also deter others from investing in solar and from supporting Vermont's commitment to reach its green energy goals. Vermont still has a long way to go in attaining those goals and should be doing everything it can to encourage and support solar power, which in our opinion is preferable to wind. We invested because we were impressed with Vermont's green energy vision while wanting to do our part to divest from fossil fuels, and felt it was a good investment based on the net metering rates and incentives that are currently in place. Please keep those incentives in place so more Vermonters can take advantage of this opportunity and we can continue to grow VT's renewable energy resources. Thank you.</p> |

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| Pat O'Sullivan | St. George | I am a semi-retired senior citizen who looks forward to use of solar net metering in the future. Please keep the program strong, open, and flexible to increase the availability of alternative energy use for Vermonters. Utilities and their investors should be working hard to encourage net metering, and move away from costly alternative (e.g., windmills on mountains) and fossil fuel options. |
| Patrick Burke | Barre | Support net metering is the obvious choice ... |
| Patty Tashiro | South Burlington | <p>I am writing in regards to the 12/7/15 proposal for net metering, rule 5.100. I am concerned some parts of it will negatively impact our ability to meet our 90% renewable energy by 2050 goal. We need to encourage more renewable energy, not make it harder or more expensive.</p> <p>1 - 10-mile radius: There doesn't seem to be a good reason to do this. It will essentially make it more difficult for high-density communities, like South Burlington, where I live, to find the space to get installations. Plus, it will add to the cost. I would suggest removing this clause.</p> <p>2 - solar adder: An efficient customer should not be penalized for being efficient. That is counter to what we are trying to achieve.</p> <p>3 - unspecified fees: Without setting some sort of cap, the fees may be too high to make it worthwhile.</p> <p>Thank you for your consideration.</p> |
| Paul Turnley | West Pawlet | <p>You, as the representatives of all Vermonters, should be building on the success of net metering, and instead, your draft rule would make it harder and more expensive to go renewable.</p> <p>It's reasonable that the credit would go down over time, but the draft rule goes too far, too fast. It only provides a 10-year grandfathering provision; but solar is a long-term investment. Such uncertainty will hurt existing customers and discourage others from going solar this year. It will make community solar more expensive and less available.</p> <p>Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. In addition, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> <p>Revise the draft to encourage net metering and going renewable.</p> |

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| Peggy Rischel | Brandon | <p>I am really concerned about some of the proposed changes to net metering - it was one of the prime reasons we went solar last year at our home. We believe that this is the way of the future and helps to ensure that those who come after us have a viable ecosystem that is not destroyed by the use of carbon-based fuels. Why on earth would you want to discourage the use of clean, renewable energy?</p> <p>To make it difficult for communities to invest in solar based on an arbitrary distance figure also makes no sense in today's world.</p> <p>Discouraging Vermonters by adding an additional non-specific fee for net metering is another nonsensical suggestion. Those of using solar are providing power to the grid and the idea that we should be charged a fee for this ludicrous. At the vary least if it felt that we should be charged for this privilege ensure that there is a cap that is reasonable and don't give the utility companies free rein here. Just take a look at what has happened to utility costs in Massachusetts!</p> <p>All I can see this doing is creating an incentive to not go solar and, if the costs for being green become extreme, to go back to doing business the "old" way - not something that I believe is the intent (at least I truly hope that is the case).</p> |
| Peggy Rishel | Brandon | <p>I am really concerned about some of the proposed changes to net metering - it was one of the prime reasons we went solar last year at our home. We believe that this is the way of the future and helps to ensure that those who come after us have a viable ecosystem that is not destroyed by the use of carbon-based fuels. Why on earth would you want to discourage the use of clean, renewable energy?</p> <p>To make it difficult for communities to invest in solar based on an arbitrary distance figure also makes no sense in today's world.</p> <p>Discouraging Vermonters by adding an additional non-specific fee for net metering is another nonsensical suggestion. Those of using solar are providing power to the grid and the idea that we should be charged a fee for this ludicrous. At the vary least if it felt that we should be charged for this privilege ensure that there is a cap that is reasonable and don't give the utility companies free rein here. Just take a look at what has happened to utility costs in Massachusetts!</p> <p>All I can see this doing is creating an incentive to not go solar and, if the costs for being green become extreme, to go back to doing business the "old" way - not something that I believe is the intent (at least I truly hope that is the case).</p> |

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| Peter and Jackie Weyrauch | East Calais | <p>As a solar owner, the idea of retroactively changing the value of the solar credit I get from my utility is simply unfair and has no justification.</p> <p>We took out a lease on our system with a fixed monthly payment with the promise that going solar would help stabilize our costs as we got older. We made a financial decision to invest in clean energy under the existing rules to combat the rising costs that surround us these days. All of our utility and commodity costs have gone up, including governmental fees and taxes, while salaries and gains have not kept pace.</p> <p>The fact our local utility raised our utility costs almost 20% in one year is what spurred us to consider solar in the first place. Now, you want to penalize us with vague rulings that benefit no one. It's bad enough our local utility can't even seem to run it's net meter system properly, now you want to complicate it further. Every year, our local utility wants to take more away from us in our solar program that we installed in good faith. This bill only helps them to do that, not the consumer.</p> <p>We installed solar at our home because we believed that Vermont's image as a "Green State" was true. Negatively affecting the solar generation and pocketbooks of those of us who have chosen to do something about the environmental needs of this State and Country is not in that spirit of being a renewable or "Green State".</p> <p>Finally, my wife and I have no children and in our age and will probably downsize shortly. If you change the value of solar retroactively, you affect the ability and value of real estate on our property and the ability for us to sell it if we so choose. This bill only penalizes those of us who have made a commitment for the "public good" and it discourages solar growth in our communities which is precisely what this state should be doing, not complicating it or making it more expensive.</p> |
| Peter Blose | | <p>I understand this proposed rule is to be retroactive. It seems to me that that is fundamentally unfair and possibly unconstitutional. Even without being retroactive it seems to me the proposed rule is not very well thought out and invites problems. In my opinion the proposal should be rejected for further consideration of the problems it tries to address</p> |
| Peter Edling | Hinesburg | <p>My wife and I have decided to go solar and we're shocked to hear the net metering policy will be changed in the near future. We're working closely with our bank to make the finances work our project. If net metering were retroactively changed, we would be put in a really tough position financially. We feel that going solar is the right decision for Vermont and our planet. We know Vermont and the country's renewable industries have grown year after year- not just because renewable energy is the right choice for our future, but because the incentives and tax credits actually allow folks to afford to make the switch to renewable. We think it's a terrible idea to change the current net-metering policy.</p> <p>We understand that solar in Vermont may not benefit the utilities as much as homeowners, but utilities should not be run as a capitalist business. Please make the right decision for the future of Vermont.</p> |
| Peter Heaney | | <p>We need more solar panels in Vermont and less reliance on fossil fuels. The evidence that we are in the midst global climate change is overwhelming. Please do not retroactively place a financial burden on the very individuals who are trying to meet the state's goal of 90% renewable by 2050. Net metering was the primary incentive for our family to make the considerable investment in solar panels. I currently have a daughter at UVM who will most likely be heading to vet school. We cannot afford to have our solar costs go up! The deal I signed when I purchased the solar panels included net metering and to retroactively change the value of the solar credit I get is unfair.</p> |

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| Peter J. LaBelle | Cavendish | <p>The Cavendish VT Energy Committee has deep concerns with the proposed rules, especially with respect to the credit for excess generation in proposed rule 5.105(D)&(F). That rule would virtually eliminate any economic incentive by requiring incentives only on excess generation. While a reduction of the credit over time is necessary, its elimination will stop many small installations and erode the progress that has been made towards energy independence. The credit should remain on the full generation, not just on the excess and should remain at the levels previously established. We are also concerned with the allowable fees that a utility may charge for net metering, which we believe are left open ended and not properly capped under the proposed rules. We believe that the utilities should be reasonably compensated, but we also believe that the PSB must play a continuing role in helping Vermont achieve energy independence. A plethora of fees will discourage further solar development and progress towards that independence.</p> |
| Puja Senning | Huntington | <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> |
| Rachel Fussell | Stowe | <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |

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| Richard & Gail Butz | Bristol | As a strong supporter of alternative energy so Vermonters can reduce their carbon footprint and experience long-term savings , I am concerned about the PSB's proposed changes as outlined in rule 5.100. Please don't muddy the waters in this important issue. |
| Richard Shappy | | <p>I know it will be easy to get mired in the details of rewriting our net metering law but, I ask you not to lose site of the reasons why we must change where we get our energy. We as a state and country cannot continue to be addicted to fossil fuels and all the problems that it inflict upon us, our children and the world. Have we not had enough of sending our sons and daughters to defend access to oil in the name of moral goals? If climate change is not reversed we face unknown perils to our basic way of life. It threatens not only the environment but our economy and security.</p> <p>A net metering law that encourages individuals and businesses to invest in renewable energy is crucial to keep the momentum of replacing fossil fuels with clean energy. I purchased a solar energy system last year. Without the help of Vermont's Net Metering law's additional production payment I would not have been able to afford to make the investment.</p> <p>Please consider the important decisions that you will make regarding the Net Metering law. They will have major impacts on the local energy landscape and the world's future.</p> <p>Thank you for your consideration.</p> |
| Richard Ware | Milton | <p>If you truly wish to encourage and support renewable energy options in crafting your policies, it makes no sense to strip incentives out of existing rules.</p> <p>I strongly urge you to enhance rather than reduce or mitigate existing rules encouraging sustainable energy options. This should also include improvements where CONSERVATION of energy is involved.</p> |
| Richard Wheatley | Underhill | We thought about going solar but it wasn't until we found an affordable option through tax credits, financing and net metering that it was possible. When we learned about solar credits coming from the utility it seemed to make sense to us. I think there should be a fair charge for the line costs. I thought I got into this deal here with an understanding that current net metering rates would continue – if it doesn't continue it would kill solar installations in Vermont. I don't mind paying a bit above what I thought I was going to be paying because I'm producing good clean energy. |
| Richard Wheatley | Underhill | We thought about going solar but it wasn't until we found an affordable option through tax credits, financing and net metering that it was possible. When we learned about solar credits coming from the utility it seemed to make sense to us. I think there should be a fair charge for the line costs. I thought I got into this deal here with an understanding that current net metering rates would continue – if it doesn't continue it would kill solar installations in Vermont. I don't mind paying a bit above what I thought I was going to be paying because I'm producing good clean energy. |
| Robert Bliss | Brattleboro | Don't make the same mistake as Nevada! |
| Robert Flynn | Essex Junction | <p>It's pretty obvious that net metering as it currently exists helps encourage people of Vermont to "Go Solar." As my wife and I drive through portions of this great state we are thrilled and excited to see so many solar panels on homes and fields.</p> <p>I believe it is important to be building on the success of net metering, and their draft rule instead would make it harder and more expensive to go renewable.</p> <p>I would like to know who exactly is behind this effort to diminish the value of net metering.</p> |

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| Robert Oakes | Putney | Please do not diminish the quality of current net metering policies. New policies should not hinder the development of solar across Vermont. Vermont has always been a leader on so many progressive issues and lets make sure that we stay at the forefront when it comes to renewables. Thank you |
| Robert Spottswood | Norwich | <p>We installed rooftop solar in 2013 thanks to a very small, one-time inheritance, and the benefits and contract have helped us 'sell' our neighbors on solar ever since. The incentives are concrete and convincing. Many have asked about how to get started.</p> <p>But according to our VPIRG, the convincing benefits and contract are now under attack. Is this part of the Koch brothers' ALEC assault on solar at the state level, so successful in Kansas and down south?</p> <p>The full value with the adder is exactly what is needed to motivate people over the start-up cost hump. As VPIRG puts it: "It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast." Where are the speed brakes coming from, and whom do they serve?</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. Ten mile group net-metering limit? Whom would that rule serve? It would certainly slow down community solar in areas without ideal solar exposure.</p> <p>The rule would create significant uncertainty for all net metering customers. As VPIRG puts it bluntly: "This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward." It certainly would have discouraged us. Isn't this how corporations treat their retirees' pensions and health care? "Sorry, we're changing your contract." Or not-sorry.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Is this just a corporate rip-off, or merely corporate piracy? Any way you slice this it sounds anti-social to us. I suggest moving to publicly take over private utilities who even think this way.</p> <p>Thank you for acting in the best interests of solar at the citizen level, versus corporate greed.</p> |
| Robin Worn | Huntington | Keep net metering strong and viable! We personally spent a lot of money doing our part to reduce carbon emissions by installing solar panels a couple of years ago. We understood that there would be a cost benefit to us re: our electric rates. While we don't expect the benefit to go on forever, we aren't expecting a large reduction in the "adder" rate yet, nor all at once. Please make sure there are protections in place for all of us who have lead the way in helping to put Vermont on the road to renewable energy. |

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| Roger Weintgarten | Montpelier | Vermonters need you to keep net metering Strong and Viable. Don't let us down. |
| Ruah Swennerfelt | Charlotte | My husband and I have been part of a net metering program for several years now. Net metering is a program that encourages people to contract for renewable energy at their homes, both wind and solar. We want to encourage more renewable energy in Vermont, hoping one day to be free of fossil fuels. We can do it. But your net metering draft rule would make it harder and more expensive for homeowners to contract for solar or wind. That doesn't make sense when Vermont has made a commitment to go renewable! |

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| Ryan Dudley | | <p>I was told this evening about the proposal to retroactively reduce or remove some of the incentives for net metering that is currently in place for homes with solar power that net meter.</p> <p>I have just signed up to have my house converted to solar power this spring. This has been a big decision for my wife and family and it comes with a lot of costs. We are not doing it to save money as the cost of the installation loan will cost slightly more than our current electric bill. Not only that, we are taking out a loan for \$40,000 for this installation. This added financial liability will hit our credit scores and affect our net worth for years to come. With three young children, this comes with a lot of risk that scares us and is something that we did not take lightly.</p> <p>We have made this decision because we feel that it is the right thing to do for the environment. As a family and as community members it is important for us to take actions that will better our environment for years to come. This installation will reduce our use of fossil fuels which is our long term goal we have made as a family.</p> <p>Taking this incentive away will have a negative impact on others that would otherwise make this same decision to better our environment. As a state and as our state leaders I urge you to take steps to make more incentives that will allow citizens to convert to solar and further diversify our state's energy production. Don't take them away.</p> <p>Taking this away is not what our state needs. We need to be the examples of what more states should be doing to better our world. We are better than this. We are Vermonters and our environment is part of our brand. A brand that needs to be protected, not compromised.</p> |
| Sam Conant | Milton | We should be enhancing net metering, not limiting the resource net metering represents. |
| Sara Burghoff | Underhill | <p>It is important to me that Vermont's net-metering continues as strong as it is now. There are personal reasons I feel this way, but there are reasons that it is important for the community, too. I am low-income, and put all the money I had into solar panels, so that I could continue to 1) afford electricity and 2) support a way of living that did not rely heavily on fossil fuels.</p> <p>I believe that we should be building on the success of net metering, Please do not in any way make it more expensive or more difficult for every individual to go solar.</p> <p>It is already difficult for me to explain to my friends that they have to invest for the long-term. Please don't make it more difficult or we might be going backwards instead of forward in our goals to use renewable energy.</p> <p>Thank you for your time.</p> |
| Sarah Lincoln | North Ferrisburgh | I have a solar tracker and I think you all need to keep this benefit to encourage renewable energy. |

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| Seth Carvill | Rutland | <p>I work for a solar energy company and I believe that some of the changes proposed in the new net metering will hurt the state and erode trust both in clean energy and in the state government</p> <p>Many of the folks I work with decide to go solar did not only to help the planet but also to invest in their home and see a financial payback. They did so with the belief that they would be grandfathered in to the law of the land at the time. To retroactively change the amount that people get serves no purpose, and will only have people loose faith and trust in their state government. For someone who went solar right before retirement, or is just raising a family this kind of thing could seriously harm their carefully balanced budget.</p> <p>Solar is one of the fastest growing industries in the state of Vermont with over 1600 people employed. Clean tech employs over 15,000 people state wide. Many of the folks employed are young, or members of young families. Vermont has been experiencing a "brain drain" of young talent leaving the state for decades. A few young folks I worked with as a High School aid are getting trained as technicians for this work and this industry IS helping keep our kids in state. To destroy trust in the industry by retroactively changing the rules which folks expected to be guranteed for 10 years after their installation would harm folks' trust, shrink the market, and eliminate opportunities for Vermont's kids. Please do the right thing. If you have to change the rules for the future so be it but keep your word to people with permit approved.</p> |
| Shelly Martin | Morristown | <p>We recently built our own home and are strongly considering installing solar panels on our roof, because it makes economic sense long-term and it best for the planet. As born and raised Vermonters, we are concerned about the lack of transparency and consistency with the net metering fees that utilities charge consumers. In addition, we are concerned that the value of solar is not fully realized by only giving full credit to the EXCESS electricity produced, not all electricity produced. Furthermore, we are concerned about the short 10-year grandfathering provision. Solar is a long-term investment and needs to be treated as such. If we want to continue being a leader in this realm, we need to address these issues, so that more Vermonters will consider, and hopefully install renewable energy at their homes and businesses.</p> |
| Sherlyn Meinz | Springfield | <p>It's time to move forward toward renewables, let's make it easier and less expensive! Don't let the draft rules do the opposite.</p> |
| Silas Ratico | | <p>Having made the investment in solar for our recently purchased home I find the rumors of retroactively imposing changes to the net metering structure not only alarming but extremely distasteful if true. I can only hope they are just that, rumors. The investment in solar is not a small one, as is the roi long. I am a young Vermonter who is proud to own a home here, Vermont is a hard place to financially make a living. When I choose to get solar a did it with my financial future in mind, with the end goal of bettering my chances of being able to afford to stay in Vermont.</p> |
| Spencer Putnam | Weybridge | <p>Net metering has provided a much-needed boost to Vermont's move toward alternative energy. Our family has both on-site (roof-top) and remote solar, making our house and our electric car net zero. I am very concerned at any proposals that would weaken the attractiveness of net metering, specifically:</p> <ul style="list-style-type: none"> --Reducing the adder should be done gradually, if at all. --The rule allowing participants to live anywhere in their utility's territory should not be changed unless to make it easier to enroll in arrays outside that territory. The ten-mile proposal is particularly troublesome. Many people will not be able to find an available array within ten miles of where they live. --Long term predictability needs to be built in so that the rules will not change once people are signed up. --Hook up fees are unnecessary and will discourage participation. <p>Solar arrays decrease the load on the grid, helping to reduce over all costs.</p> |

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| Stanley Gryzb | Middlebury | I believe that your proposed changes to net metering would discourage Vermonters from participating in solar projects. The Legislature has proposed and passed goals for Vermont to acquire its energy from renewable sources. If the PSB alters the favorable net metering environment that presently exists it would be doing a disservice to those goals. Please respect the desires of the individual Vermonter rather than be subservient to the avarice of the energy industry. |
| Steph Holdridge | Burlington | I join Governor Shumlin in supporting a robust solar power development in Vermont. To that end I strongly urge the PSB to enhance net metering opportunities for Vermont citizens and NOT to put more restrictions on net metering which is what the utilities are lobbying the PSB for. Please stand on the side of hard working Vermonters trying to make a difference in the world with alternative energy generation. Your policy decisions can foster more solar or discourage it. Please support robust solar development by homeowners and community solar and commercial solar. |
| Stephanie Woods | South Hero | Some of the financial and other changes to current policy seem to limit the viability of new solar investment. I think we should be doing the opposite and making every effort to support transition to solar |
| Stephen Salin | Shelburne | <p>As architects we're trying to encourage our clients to put solar panels on their roofs. Even under the present rules regarding net metering we're only just beginning to see some clients consider them on their projects. Weakening those rules right now would set us back on promoting solar.</p> <p>Please keep the present rate structure giving full retail value including the "added" for all of the energy they produce, not just excess energy.</p> <p>Please provide assurance that net metering will stay in place even after 2017, and that those systems installed prior to 2017 will have a longer grandfathering provision than the proposed 10 years. It is a long term investment in today's dollars, not future dollars.</p> <p>Please do not allow an additional fee to be charged by utilities. That unspecified fee could potentially negate all of the progress so far.</p> |
| Stephen Twombly | Roxbury | Please keep Vermont's net metering efforts robust! |
| Steve Jonas | Westminster | I am a longtime and current resident of Vermont -- as well as a photovoltaic panels and solar hot water panels owner. I strongly urge you to continue to support net metering. Vermont should be at the forefront of renewable energy and this would continue that momentum and progress. Please don't go backwards in our pursuit of a renewable future. |

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| Steven Schlusssel | Rupert | <p>The present net metering rules have been a godsend to Vermont's transition to renewable, clean energy and were instrumental to us in our solar conversion in 2014. Please allow others this incentive to do the right thing.</p> |
| Steven Stone | Brattleboro | <p>It is very important for Vermont to encourage the use of renewable energies, it is especially encouraging that Vermont is willing and able to produce a lot of power at a very local and small scale level. One of the reasons that this remarkable thing can happen is because of net metering. Please don't put a 10 mile limit on the community solar power projects, this makes no sense and just puts an undue burden on getting a community to rally around clean energy production. As solar projects are normally planned for twenty years plus, it is important that the laws need to be set up so folks can be sure not to lose money when investing in a cleaner way to produce power. Please make sure the rules do everything to promote net metering (clean electric) and do nothing to prevent citizens from shying away due to a poorly written program.</p> |
| Susan Crockenberg | Charlotte | <p>Your plan to add a rule to Vermont's net metering program that would undermine our ability to choose clean power sources is not acceptable to me personally. Such a rule would make it more difficult for the state to achieve its renewable energy goals. Why on earth would you move in this direction? I am totally opposed to this addition.</p> |
| Susan Delattre | Randolph | <p>Here are my comments on your proposed net metering rule: The value for solar falls short. The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The rule would create significant uncertainty for net metering customers. Utilities may charge an additional, unspecified fee for net metering customers. Your draft rule would make it harder and more expensive to go renewable.</p> |

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| Susan H. Leonard | New Haven | <p>I am writing to voice my concern over the draft net-metering rule 5.100. I had net-metered solar panels installed several years ago based on the numbers I was given re: the amount I would be paid for the electricity I generated. I now understand that the new program would limit that amount to the first 10 years of operation. New residential solar generators (and old ones like me after the 10 years) would receive a lower amount for the power they generate because it would only apply to EXCESS energy - i.e. not including the power they themselves use.</p> <p>I am living on Social Security retirement benefits and would not have gone solar if these new rules had been in effect.</p> <p>If the State is to be a leader in alternative energy, I hope that little guys like me don't have the rules changed on them by this proposal, even if the change doesn't take place until the 10 year mark. My panels are leased for 20 years, which is the amount of time I thought I was signing up for.</p> |
| Susan Leigh Deppe | Colchester | <p>Please do not reduce the solar adder too fast. It should go down very slowly. We need much more solar energy, properly sited, to protect the planet and meet our energy needs. You might even consider an extra cent or two on the solar adder for projects on buildings, brownfields, parking lots, and any other site that is not prime, scenic agricultural land, to incentivize good siting.</p> <p>Please set a very low limit on any fee utilities may charge solar customers, or prohibit such fees. We need to incentivize solar development.</p> <p>Please do not restrict group net metering other than by utility service area; it is to be encouraged.</p> <p>I would also suggest that we strongly incentivize developers or project owners who retire the RECs and contract to never sell them. Why should Vermont's precious land be used to offset dirty power plants out of state? We need to meet our own renewable energy goals and build our own resilience.</p> <p>Please make the process predictable for people to go solar in 2016 and beyond.</p> |
| Susan Monkres | Burlington | <p>As someone who has benefitted tremendously from innovative programs to achieve energy efficiency, such as no-interest loans for insulation and replacing an ancient boiler, a tax credit for my woodstove, and support for installing water heating systems that will be compatible with solar in the future, I applaud Vermont's leadership in this area. I hope we will continue to lead and innovate to build a resilient world. Please preserve net metering as one necessary component of this.</p> |
| Susan Rikken | East Montpelier | <p>As you update the net metering program, it's essential you keep it strong. The program should encourage, not hinder new solar energy production. Specifically, I'm concerned with the 10 -year grandfathering provision. Potential net metering customers need to know in advance what to expect in terms of rules and rates over the course of their solar investment. Uncertainty will discourage investment in net-metering. That utilities may charge an additional, unspecified fee for net-metering customers is another deterrent. Taken together, these and other proposals leave one to wonder if the intent of the PSB net metering updates is indeed to discourage new net-metering. Please replace these proposals with strategies that will encourage, not deter, new net-metering.</p> |

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| Suzanne Leiter | | We own a solar tracker in a Solaflect solar park and it has been very positive. The changes in the incentives are drastic, unpredictable and hard to understand. It will mane a slowdown in those converting to solar at a time when our state has committed to get to 90% renewables by 2050. Also, I realize that if a solar customer is paying the electric utility nothing, that customer is not helping maintain the electric grid but I do not believe the proposals are fair. Also, the 10 mile rule is arbitrary and does not always make sense. Uncertainty is bad for utilities and solar customers alike and these proposals will only increase uncertainty. |
| Suzanne McCoy | Hinesburg | I support a strong net metering program that continues to make it easy and affordable for Vermonters to go renewable. |
| Sylvia Perera | Burlington | I put solar panels on my roof last spring and am very happy that they were affordable and also cut my electric bill a lot. I am also happy that when I am not using the power it goes back to the city of Burlington so community solar is not too expensive. Please help to keep building on the success of the program in cutting energy costs and making them green. It would be a BIG mistake to make that harder and more expensive with the proposed additional fees for net metering customers |
| T. Ryan Haac | Sharon | Dear Public Service Board, Please accept the attached document from the Sharon Energy Committee as comments to the revised net-metering rules draft document published by the Board on December 7, 2015. |
| Taborri Bruhl | New Haven | Having looked over the draft net-metering rules, I see in them some attempt to balance the needs of net-metering customers with the needs of the utilities, the latter of whom must maintain the grid and keep it functioning, even as net-metering customers use it, in effect, as a giant battery. As such, I will refrain from making particular complaints or suggestions, but I would like to strongly urge you, as you seek to find the right balance here, to err on the side of not making net-metering more difficult or expensive. As we go forward, our state (and the planet) will require much more net-metering from thousands and thousands more installations (preferably small-scale ones on people's roofs and yards), so not impeding movement in that direction is probably in everyone's long-term best interest. |
| Terrance Naumann | Richmond | Vermont should be making net metering STRONGER not weaker! Especially with gasoline so cheap the fight against climate change and dirty fossil fuels has gotten so much harder. |
| Terrence Dinnan and Martha Illick Dinnan/Illick | Charlotte | Please!: -retain at least 10 yr. grandfather clauses for "tariffs" to allow for planning. -retain group sharing within a utility's range.....NOT limited by mileage. -allow utilities to cut checks to refund credits for excess generation. This will incentivize system owners to conserve (increase their credit) rather than use up excess generation by using more electricity. Maybe offer a "cash credit" category that system owners can elect to be paid cash (and therefore wouldn't have to set up group net metering) in exchange for accepting the going "residential rate" without the tariff. -ABOVE ALL.....continue to support net metering in every way possible...the shift to renewables is such a winning strategy we need to do all we can to keep it going. STAY PROGRESSIVE AND SUPPORTIVE!!! T H A N K Y O U ! |

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| Thomas Pryzby | Windsor | <p>We need to be building on the success of net metering, not restricting its value now or in the future.</p> <ol style="list-style-type: none"> 1) Do not de-value the amount of credit for net metering. 2) Do not restrict group net metering in a way that will discourage community solar 3) Eliminate the uncertainty of net metering by not limiting the 10-year grandfathering provision, and for offering no stability for new customers as of 2017. 4) There should be no monthly fee for renewable customers, especially with no provisions for a cap. |
| Tim Hoopes | Hinesburg | <p>Please keep the net-metering program strong in VT. Utilities should not be allowed to charge fees pertaining to this program. The value for Solar should remain at a level high enough to encourage installation of Solar. Utilities should be in service to the people of Vermont, they should not be stopping citizens from installing Solar and taking charge of their own energy profiles.</p> |
| Tim Labor | Manchester Center | <p>To the members of the Public Service Board,</p> <p>I must say that I am very proud of Vermont's current implementation of solar incentives. Solar power is a great way to turn unused/underused square footage into energy. Because the industry is still maturing, the cost of an installation is still a bit high. However, Vermont has created a system to help mitigate the high cost by offering strong incentives through net metering.</p> <p>I want to have a clear conscience with regard to the power that my family and I consume. Last year, I took a second mortgage on the our home and purchased and installed a solar panel array on our roof. The payments of principal and interest remain in a delicate balance with the cost of the power that we consume. If the incentives were weakened, I can't imagine how I could maintain the balance and afford the clean power that I desire.</p> <p>I realize that the money has to come from somewhere, but I feel that consumers of traditionally, non-renewable, generated power need a reason to switch to clearly generated and renewable power.</p> <p>Until the market matures and the cost of ownership becomes more reasonable, please work to maintain the incentives making it possible for customers wishing to make the responsible choice.</p> |
| Tim Roper | | <p>As a member of a community solar array, I truly hope the information I've recently seen, purporting that a potential rule change to the state's net metering program would include the ability to reduce the "solar adder" I currently receive on my GMP bill, is false.</p> <p>My decision to join a CSA was in support of Vermont's solar industry, strongly supported by a positive economic model and accompanied by my switch from propane heat to a high efficiency heat pump. It's the savings on the cost of my electricity that enabled my wife and me to budget the installation of the heat pump. Since I am aligned with Vermont's goals of reducing our use of carbon based fuels, the idea that this state would go back on the promise it made to me, guaranteeing a minimum of ten years where I could count on receiving the same "solar adder" amount is beyond appalling. So much so that I can only believe the rumored reversal is a falsehood, imagined by someone outside of the rule making process.</p> <p>My state would never punish me for doing the right thing, would it?</p> |

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| Commenter | Town | Comments |
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| Timothy Fisher | Cornwall | <p>I am concerned that some of your proposed changes to net metering regulation and rates will retard the state goal of producing more renewable energy. I am concerned that your proposals could change the terms under which I constructed and budgeted the PV panels on my house and pay me less for the power I am contributing to the grid. You also evidently are considering permitting GMP to charge an additional monthly fee for net metering contributors to the states energy needs. I already pay a monthly roughly \$14.00 fee to be connected to the grid.</p> |
| Titus Presler | Montgomery Center | <p>My wife and I recently installed solar panels on our roof in the hills above Montgomery. They're operating well, and we just received our first bill from VEC, which reflects a net-metered contribution from our solar panels.</p> <p>We reckon the payoff period for our investment in renewable energy is 12-14 years, depending on production.</p> <p>I write to register some concerns about your proposed new rules:</p> <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont. THIS PROPOSAL WOULD SIGNIFICANTLY EXTEND THE TIME PERIOD OVER WHICH OUR INVESTMENT WILL PAY FOR ITSELF. WE INSTALLED SOLAR WITH A GOOD-FAITH UNDERSTANDING OF WHAT OUR PAYBACK PERIOD WOULD BE. IT IS NOT FAIR TO CHANGE THE RULES SO DRASTICALLY MIDSTREAM.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. THIS CHANGE WOULD NOT AFFECT OUR HOUSEHOLD, BUT IT WOULD NEGATIVELY AFFECT THE SPREAD OF SOLAR IN VERMONT.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward. A 10-YEAR PROVISION WOULD NEGATIVELY AFFECT US, BECAUSE OUR PAYBACK PERIOD IS 12-14 YEARS. WE UNDERTOOK A GOOD-FAITH INVESTMENT, AND THE RULES SHOULD NOT BE CHANGED MID-COURSE.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be. THERE IS NO JUSTIFICATION FOR A FEE FOR NET METERING CUSTOMERS. WE JUST PAID \$150 FOR A PRODUCTION METER, PLUS \$50 INSTALLATION. WE ARE HELPING VEC IN POWER PRODUCTION. A FEE WOULD BE TOTALLY UNJUSTIFIED.</p> |

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| Commenter | Town | Comments |
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| Todd Lockwood | Burlington | <p>I am an owner of an Electric Vehicle and I have solar panels on my roof to power my car. In looking at these proposed net metering regulations it feels like the policies are counterproductive and are a hindrance to renewables instead of encouraging their growth.</p> <p>Adding a charge to all solar customers and taking away the solar adder for power used directly from the solar is exactly opposite of what you should be doing and affects people like me who have already gone solar as well as hinders new people from signing on.</p> <p>I hope you'll reconsider these regulations and how they discourage new renewable energy in Vermont.</p> |
| Todd Lockwood | South Burlington | <p>I am an owner of an Electric Vehicle and I have solar panels on my roof to power my car. In looking at these proposed net metering regulations it feels like the policies are counterproductive and are a hindrance to renewables instead of encouraging their growth.</p> <p>Adding a charge to all solar customers and taking away the solar adder for power used directly from the solar is exactly opposite of what you should be doing and affects people like me who have already gone solar as well as hinders new people from signing on.</p> <p>I hope you'll reconsider these regulations and how they discourage new renewable energy in Vermont.</p> |
| Tom & Emily McManamy | Starksboro | <p>As a solar owner, the idea of retro-actively changing the value of the solar credit I get from my utility is unfair and would be quite painful. We took out a 12-year loan with a fixed monthly payment to ensure that going solar wouldn't effect my family's monthly budget. My husband and I made a financial decision to invest in clean energy under the existing rules. I urge you not to pull the rug out from under us.</p> <p>We made the decision to install solar at our home because we're working on reducing or eliminating expenses as we start a family. We wanted energy independence and predictability - the proposed changes disrupt that. That decision would be undone if you change the value of solar retroactively. We can't afford for the rules to change.</p> |
| Tom Cate | Montpelier | <p>Global warming is upon us- solar make sense - do everything to support the use of solar.</p> |
| Tom Durne | Middlebury | <p>I serve on the board of Acorn Renewable Energy Co-op, in a volunteer role, and have been involved in the development of several group net metering arrays over the past five years. It is very difficult, as the conditions now exist, to put together a community 150 kW solar array especially ones that retire the REC's, as ours do, to produce truly green energy. Please do not make things worse by making community solar more expensive or less certain for future development. In stead, it would be great if you would consider rules that require utilities to pay for all of the excess power generated and allow consumers to participate in more than one project even though they only have one meter. This would encourage customers to purchase electric cars and cold climate heat pumps since they could then be covered by investments in multiple renewable energy projects. The goal should be to encourage more use/development of renewable power for Vermont to meet its ambitious goals.</p> |
| Toni Campilongo | Bennington | <p>Renewable energy should be what we are working toward. Please don't make it more difficult for Vermonters. We are proud of our state and strive to make it better than ever.</p> |

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| Commenter | Town | Comments |
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| Tony Reddington | Burlington | <p>I share the concerns of VIRG over the proposed net metering rules changes--as follows:</p> <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> |
| Tracey Kawecki | Norwich | Please keep net metering affordable |
| Tracy Titchner | Essex Junction | <p>We just signed up for a community solar project a couple of months ago.</p> <p>We read the fine print carefully, and it seems like it will be a good deal for us, for the power company and for the environment. I'd hate to see the public service board change the rules to make it harder to sign up for community solar projects that were located in optimal sites just because they didn't live within ten miles of the project. Changes to the net metering agreements will make it harder for homeowners to make the leap. We live in a location where putting up panels on our own property doesn't make sense, so the net metering rules and community solar are the only viable options for us to 'go green.'</p> |
| Trisha Lavery | Burlington | We should continue forth with the evident successes brought forth by net metering, and proceed with further innovations in the processes to better the system. Rather than establishing new rules which prohibit our states growth in renewable energy infrastructure. |
| Violet Gautesen Krukonis | Essex Junction | Net Metering should be available to everyone who installs renewable energy source. |

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| Vivian S. Valtri Burgess | Middlebury | <p>The value for solar falls short. Right now, net metering customers get the full value (the retail rate and an "adder," adding up to 19 or 20 cents) for every kWh they generate. It's reasonable that this credit would go down over time, but the draft rule goes too far, too fast. If adopted, new net metering customers would only get an adder for the system's excess power generation (which means any power generated in a month beyond the needs of the owner). This would reduce the amount most Vermonters who go solar receive for their power by as much as 20% (or more) and significantly slow down renewables in Vermont.</p> <p>The rule proposes restrictions on group net metering that will make community solar more expensive and less available. The draft rule would require group-net metering customers to be within 10 miles of the system. This would exclude many Vermonters from investing in projects in well-sited areas in their utility's territory. It would also be a significant departure from how net metering works today - driving up the cost of community solar while limiting availability for customers living in less densely populated areas. We understand the need to site projects in optimal locations to reduce costs (building near where power is needed, for instance), but this won't achieve that goal, it will only slow down community solar.</p> <p>The rule would create significant uncertainty for all net metering customers. For systems installed before 2017, the draft only provides a 10-year grandfathering provision, meaning the rules and rates could change from what people anticipated when they first invested in their systems. Solar is a long-term investment; such uncertainty will hurt existing customers and discourage others from going solar this year (before the rule would take effect on January 1, 2017). For new net metering customers (2017 and beyond), the rule offers no stability. It doesn't say how long a new net metering customer would have the deal they sign up with. This kind of uncertainty will discourage people from investing in net-metered renewable projects moving forward.</p> <p>Utilities may charge an additional, unspecified fee for net metering customers. Charging Vermonters a new monthly fee for the right to go renewable will drive up the cost of net metering, and drive down participation. What's worse, there is no indication as to how much this fee could amount to or a cap on what the fee might be.</p> <p>We should be building on the success of net metering, and your draft rule instead would make it harder and more expensive to go renewable.</p> |
| Wendy McArdle | | <p>I pay my electric bill with solar credits from a Community Solar Array, the idea of retroactively changing the value of the solar credit I get from my utility and adding a new fee is ludicrous. These incentives were instrumental in many Vermonters' decisions to invest. I purchased a cold climate heat pump for my home and I'm leasing an EV specifically so that I can use clean electricity rather than fossil fuels for my heat and transportation. I budgeted based on the rules at the time, and I was led to believe that scenario would not change. Changing the rules and enforcing retroactively would impact my personal finances and damage my faith in government. It will also tarnish Vermont's reputation and be counterproductive to the State's CEP goal of 90% by 2050. Please reconsider.</p> |

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| Will Colgan | Montpelier | <p>am writing in regards to the proposed net metering rule changes that are being considered.</p> <p>I don't have a solar installation at the moment but I am considering the prospect of installing one in the future. I know quite a few people who have done it and I have family in other states who are not able to reasonably make the investment due to the rate structures in their state.</p> <p>I believe we should not make it more difficult and cost prohibitive to install solar installations by changing the present net metering structure. I understand as more solar installations come on line this impacts the utilities and their business model but I think they will have to adapt to the new diversified sources of power.</p> <p>Any rule change should make it feasible for the utilities to continue to operate the grid but the net metering rules should continue to promote the installations of solar.</p> |
| William McMains | Jericho | I support a strong net metering and think it is too early to reduce supports for local solar development. |
| William Roper | Weybridge | Please keep the net metering pricing incentives in place. I have a panel that I installed 2 years ago. The favorable and fixed electric rates helped to make this attractive beyond just helping our environment. These incentives are essential and for us who have installed our panels, we relied on the pricing and we would be hurt financially and very upset if you reduce the return and thereby after-the-fact make our panels more expensive. Thank you. |
| William Roy | Williston | <p>The Public Service Department's Comprehensive Energy Plan in 2011, called for 90% of the state's energy needs (electric, heating, and transportation) to be met with renewable energy resources by 2050.</p> <p>We were an early adopter of solar panels on our home. Some of your proposed changes to the net metering program are disturbing to us. We thought our solar installation a few years ago and our recent mini-split heat pump installations were to be a welcomed part of Vermont's plan to be a leader in renewable resources.</p> <p>Why make it harder and more expensive to go renewable? Renewables are good for business, good for the economy, good for the planet!</p> |
| William Samson | Enosburg Falls | Please do not hurt the growth of Renewable energy |
| William Thurber | St.. Albans | We lead the nation in solar and other renewable energy, which is the way it should be. Please do not restrict or roll back any provisions or regulations which would promote this healthy growth. |