

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 19-0855-RULE

Proposed revisions to Vermont Public Utility Commission Rule 5.100	
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Town of Stowe Electric Department Comments

On June 26, 2023, the Vermont Public Utility Commission (“Commission”) filed a Memorandum in this docket setting a public hearing schedule and deadline for filing written comments.

The Town of Stowe Electric Department (“SED”) respectfully reiterates its comments previously filed in this docket and by the other Vermont Distribution Utilities. SED supports the proposed revisions to Rule 5.100 that will streamline the review and reporting requirements for all net-metering projects. Particularly relevant to SED is residential scale net-metering solar projects less than 25kW in size, with or without co-located battery storage. SED favors a procedure that requires the Applicant and Installer to review the proposed project with the utility prior to filing a net-metering registration form with the utility and Commission. This will help municipal utilities respond to net-metering applications more accurately and efficiently.

SED encourages Applicants and Installers to jointly speak with utility staff before filing a net-metering registration form with the Commission. This will reduce costs and delays in analyzing the interconnection requirements for a proposed project and can clear up any miscommunication about group net-metering, the blended residential rate, REC and Category adjusters, and other billing questions.

SED requires the following information to complete a review of each project: a site visit with utility staff, a site plan, a one-line engineering drawing, a project description that includes additional electrification and battery storage technologies, and a description on how the applicant will operate co-located battery storage. Receiving this information before an Applicant files a net-metering registration form will reduce administrative costs and give Applicants a complete picture of the costs and steps required to install residential scale net-metering projects. This can also avoid future filings related to amendments from the time the application was filed to the time the system is built and interconnected.

SED staff thanks all the stakeholders involved and the Commission for working through the Rule 5.100 revisions. SED staff looks forward to a more cohesive and streamlined process for net-metering in Vermont.

Respectfully submitted on August 17, 2023,

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