



Vermont Agency of Natural Resources

Office of Planning

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Electronically Filed Using ePUC

August 22, 2023

Holly R. Anderson, Clerk

Vermont Public Utility Commission

112 State Street – 4th Floor

Montpelier, VT 05620-2701

Re: 19-0855-RULE – PUC Rule 5.100

Dear Ms. Anderson:

On June 26, 2023 the Vermont Public Utility Commission (“Commission”) issued a Memorandum inviting comments on the Commission’s filing of Rule 5.100 with the Secretary of State. The Vermont Agency of Natural Resources (“Agency”) participated actively throughout the Commission’s workshop and rulemaking process and supports the final proposed rule as filed.

We especially appreciate the Commission’s efforts to disincentive significant forest clearing by excluding sites that require more than 3 acres of forest clearing from preferred site status. While the previous draft of the rule, which excluded sites with more than one acre of forest clearing from preferred site status, was more protective of the many values forests provide Vermonters, the final rule’s 3-acre threshold will allow for sites that clear an area roughly equal to a 500kW PV array to qualify for preferred site status, while disqualifying other sites that require greater amounts of clearing. The vast majority of net metered plants currently permitted in Vermont involve less than 3 acres of forest clearing, so we see this threshold as one that will allow continued robust deployment of net metering.

The Agency also supports clarifications made in the rule to other preferred site categories.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "B. Coster".

Billy Coster

Director of Planning

Cc: Service List