

To: Public Utilities Commission

From: Lawrence Maier & Pamela Marsh, owners of 137 Twitchell Hill Road in New Haven, VT

Date: September 6, 2023

Re: Case 22-3589-NM

Cc: Doug Surwillo, Suncommon, Rep. Diane Lanpher, Senator Chris Bray, Senator Ruth Hardy, New Haven Energy Committee, Maggie Eaton Chair

In 1994, we had the good fortune to read Noel Perrin's Life with an Electric Car. That's when it all began. In 1994, electric car technology was at the very beginning, and no one thought of having the sun power their home or even a car without dismissing it at once as virtually impossible. But it started our brains churning. How or when could we make it a reality?

In 2013, we installed a small net-metered solar system to power our home in New Haven, and when we had extra electricity, to sell it to Pam's office building in Middlebury, and to Pam's mother, who also lived in Middlebury. The system was a 14.4 kW system. We had enough to share power during the summer, but not during the winter.

As we became more and more aware of man-made climate change, we committed to increasing our clean energy electric use. Pam purchased a hybrid electric minivan in 2018, and Larry purchased an all-electric Kia Niro in 2021. Sharing power was no longer possible. In addition, we wanted to decrease our reliance on fossil fuels (propane) for our winter heating needs.

We contacted SunCommon, who had guided us through the installation of our original project, to install an upgrade that would enable us to install cold weather heat pumps and provide power for our vehicles. (We had installed a heat pump hot water heater several years earlier.) The process began in April 2021. SunCommon engineers designed a 7.7 kW system that would accommodate our needs, and provide (at some times of the year) some power sharing to Pam's office and to her mother. (Pam has since sold her office, so at this point, the sharing would be with Pam's 93-year-old mother in Middlebury.)

Meanwhile, Pam became a member of the New Haven Energy Committee, so ably chaired by Maggie Eaton. Later, Larry also provided advice to the Committee. The goal of the Committee was to produce New Haven's town Energy Plan and have it approved. Because VELCO has a large installation in New Haven, increasing renewable energy generation in New Haven to offset the energy use by VELCO was a major goal.

Not anticipating that getting regulatory approval of this project would be a big deal, considering how minor the adjustment would be, SunCommon installed the heat pumps in the fall of 2021. After a lot of work by SunCommon, the application to the PUC was filed on 8/25/2022. Various regulators required that we obtain a wetlands permit (because we had some invasive purple loosestrife) near the proposed installation. We had to show that we were not a burial ground for the Stockbridge-Munsee Band of the Mohican Indian tribe. We had to show that removal of one tree (out of 25 acres of trees on our land) would not destroy the habitat of the brown-nosed bat. We jumped through all those hoops, and then the PUC decided to group our tiny project with the much larger Petition of TES Solar, LLC Petition to amend the Thetford School District's existing 120 kW ground-mounted solar group net-metering system to 495 kW in PUC Case No. 22-1136-NMP.

Doug Surwillo of SunCommon, on our behalf, filed an objection to grouping our tiny case in with the TES Solar case due to the complete difference of the nature, size and scope of the two projects. Green Mountain Power concurred with our request to separate these projects and to allow our case to move forward. I enclose with the letter from Green Mountain Power filed in our case. Nevertheless, the PUC denied the request to lift the stay until resolution of the TES solar case, apparently due to some regulatory infighting over the rate to be paid to net-metering projects. That order was issued on 1/24/2023. Meanwhile, we continue to wait for the PUC to decide the TES Solar case, which had a hearing in February of this year, and is still under consideration.

Unless the PUC acts promptly in lifting the stay and approves our project this fall, it will not be possible for our project to be installed this year. This means another winter of paying electric bills on top of the solar loan we took out to fund the project, believing we would receive a permit in a reasonable amount of time, not more than a year after we filed. It also means that our desire to be able to cover our electric usage from renewable sources – namely the electricity generated on our property – will again be deferred. There are no doubt tax consequences as well, since we haven't been able to take advantage of renewable energy tax credits that we expected as part of this project because the panels have not been installed.

Frankly we don't care about whether we get 2 cents or 6 cents or no cents more from our renewable energy project. All we want is for it to be up and running before the winter.


The State of Vermont and the Legislature have made it clear that Vermont's energy future relies on renewable energy. Yet the PUC seems to be putting up every obstacle to encouraging renewable energy projects.

We have learned that we are not the only project that is being deliberately delayed by the PUC when requesting an amendment to a certificate of public good (CPG) issued for

an older net-metering project. We feel that the PUC is discriminating against our project – and that of other early solar adopters – by refusing to amend our CPG to allow a mere 7.7 kW of additional energy, which will be primarily used by our home, vehicles and Pam's 93-year-old mother.

When we first installed our solar project in 2013, Vermont was really only at the beginning of looking at solar as a renewable energy resource. Since that time, the State has made a commitment to increasing its reliance on renewable energy and decreasing its reliance on fossil fuels. How is what the PUC is doing designed to reach the state's renewable energy goals? And why does the PUC think that including our little 7.7kW project in with TES Solar makes any sense?

Neighbors on Twitchell Hill Road and Pearson Road have been able to install much larger projects since our application was filed. Our immediate neighbors either support or are indifferent to our project, which cannot be seen from any neighboring property. Is there any way to move this along?



Lawrence C. Maier



Pamela A. Marsh



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Liz Miller
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Via ePUC

December 14, 2022

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620-2701

Re: Case No. 22-3589-NM – Application of Lawrence Maier for an amended certificate of public good for a 21.7 kW solar net-metered electric power system in New Haven, Vermont

Dear Ms. Anderson:

The Commission issued a Procedural Order in this case December 6, 2022 requesting responses to SunCommon's request on the Applicant's behalf to lift the stay in this proceeding and process the application in advance of the resolution of the TES Solar, LLC net-metering petition, Case No. 22-1136-NMP. The size of the requested upgrade at this customer's home to serve their own use, 7.7 kW, is modest and incremental. It is approximately half the size of the original 14 kW system, and is also substantially smaller than the systems in the other matters subject to the Commission's stay, all which are greater than 50 kW. As the Commission cited in its November 7, 2022 Procedural Order Staying Proceedings, the Commission has previously permitted amendment of similar size. See 11/2/22 Procedural Order, Case No. 22-3589-NM, at note 1, citing *Application of Bill and Lara Calfee*, Case No. 18-1474-NM. Accordingly, GMP does not object to the stay being lifted in this matter. GMP appreciates the opportunity to comment. Please do not hesitate to reach out with any further questions.

Sincerely,

Liz Miller

cc: Service List (via ePUC)