

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-3883-RULE

Proposed creation of Vermont Public Utility Commission Rule Concerning Energy Storage	
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VERMONT DEPARTMENT OF PUBLIC SERVICE’S REQUEST FOR WEBINAR 5

On November 20, 2023, the Vermont Public Utility Commission (“Commission”) issued an order in the above-captioned matter asking participants to request specific topics or questions they would like addressed by the speakers at the fifth session in the ongoing webinar series. The Vermont Department of Public Service (“Department”) respectfully submits the following questions and considerations for the discussion.

Recognizing the presentations in the webinar series to date, and the rapid pace of energy storage deployment in Vermont, the Department respectfully requests that the state speakers focus on the technical standards and procedures that states are employing (or should be employing) to govern or guide the installation and operation of energy storage systems and storage aggregations. In particular, the Department is interested to hear other states’ perspectives on the subject areas highlighted by 30 V.S.A. § 8011:

- (1) the respective duties of retail electricity providers and energy storage facility owners or operators;
- (2) the electrical and fire safety, power quality, interconnection, metering, and decommissioning of energy storage facilities;
- (3) the resolution of disputes between energy storage facility owners, operators, and the interconnecting provider;
- (4) energy storage aggregators and the operation of aggregations; and
- (5) energy storage facilities paired with other resources, such as net metering and standard offer plants, including retrofits of existing plants.

An overview of each state’s approach to the aspects above would be helpful. Supplemental, related questions are provided below. For these questions, “energy storage systems” refers to

batteries or other types of energy storage configured to or otherwise capable of exporting to the grid:

Q1: What entity/entities in your state, if any, are responsible for promulgating rules or regulations for residential and commercial battery energy storage systems?

Q2: What fire codes and standards currently apply to energy storage systems in your state? What is the jurisdictional authority for those codes and standards, and if there are multiple authorities, how is coordination around energy storage systems (including updates to codes and standards) achieved? Are you considering adopting any additional codes or standards?

Q3: What are the current interconnection requirements for energy storage systems in your state, and how frequently are they updated? Are codes and standards for energy storage (and other inverter-based) systems contained within your state's interconnection requirements? Are you considering adopting any additional interconnection codes or standards?

Q4: What are the decommissioning requirements for energy storage systems in your state?

Q5: How is your state (and your state's utilities) preparing for the implementation of FERC Order 2222?

Q6: What requirements are placed on the businesses or operations of non-utility distributed energy resource ("DER") aggregators in your state?

Q7: Has your state taken any steps or employed certain requirements to help ensure that the installation of energy storage systems (and/or aggregations of these systems) does not negatively impact the state's ratepayers? What tools are available to state regulators in this area?

DATED at Montpelier, Vermont, this 1st day of December 2023.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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