

January 12, 2024

Via ePUC

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620-2071

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On December 11, 2023, the Vermont Public Utility Commission ("PUC") issued a Procedural Order Requesting Comments¹ in Case No. 19-0855-RULE related to the proposed standard draft data collection form for Biennial Update compliance reporting requirements.

Vermont Public Power Supply Authority ("VPPSA") has participated in the Commission's informal and now formal rulemaking process and incorporates its comments within.

VPPSA, as an instrumentality of the State of Vermont, has a mission to support and advance the interests of its eleven (11) municipally owned electric utilities, including the customers and communities they serve.² In aggregate, VPPSA's member utilities serve over 30,000 customers in 50 communities across Vermont in some of the

¹ PUC Order Requesting Comments, filed Dec. 16, 2023

² VPPSA Member Utilities include Barton Village; Village of Enosburg Falls; Hardwick Electric Department; Village of Jacksonville; Village of Johnson; Ludlow Electric Light Department; Lyndon Electric Department; Morrisville Water & Light; Northfield Electric Department; Village of Orleans; and Swanton Village.

most economically underprivileged and rural areas in the state, including several federally recognized Disadvantaged Communities through the U.S. Council on Environmental Equity's Climate and Economic Justice Screening Tool (CEJST).³

VPPSA has reviewed the draft data collection form and finds that while the collection form does not present any identified technical complications concerns remain that these comments may be conflated as an endorsement of the proposed changes to Rule 5.100 in their entirety.

As addressed in VPPSA's filing dated August 17, 2023 in this proceeding, these issues and concerns remain unresolved. The rapidly changing landscape as grid modernization and electrification exponentially grows in-step with the Renewable Energy Standard (RES) and Global Warming Solutions Act requirements, notwithstanding the proposed RES revisions currently being considered within the Vermont Legislature. As acknowledged within the Commission's May 17, 2023 Procedural Order Responding to Participant Comments, the interdependencies between Rule 5.100 governing Net Metering and Rule 5.500 on Interconnection Procedures, under which energy storage has also been included during the informal rulemaking process.

In conclusion, VPPSA appreciates the opportunity to engage in this formal rulemaking process and stresses the significant impact any proposed changes may have on the ability to deliver safe, reliable, and affordable electricity to Vermonters,

³ See Climate and Economic Justice Screening Tool published Nov. 22, 2022.

while still supporting renewable energy growth and sustainability for the human and natural environments. If the Commission has any questions or seeks further clarification on any of the positions raised, please don't hesitate to contact me.

Respectfully,

/s/

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