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Via ePUC

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

Re: Case No. 21-3883-RULE – Proposed creation of Vermont Public Utility Commission Rule Concerning Energy Storage

Dear Ms. Anderson,

Green Mountain Power (GMP) appreciates the opportunity to respond to the Commission's May 21, 2024, Order issuing a first draft of the new storage rule. Our responses primarily focus on engineering and technical interconnection issues and are set out below after each of the Commission's topics.

1. Definitions. Are additional definitions needed? Are the proposed definitions appropriate or in need of modification?

GMP Response

The definition for "Aggregation" should include the word "and" before the statement, "or wholesale electricity markets," so when included should read:

"Aggregation" means combining individual energy storage facilities with other energy storage facilities or distributed energy resources for management and coordination to participate as a single resource in authorized retail market programs and/or wholesale electricity markets.

We recommend changing "Capacity" to be "Nameplate Capacity" and add a definition for "Maximum Export Capacity," which would be defined as the maximum output capacity that the project will export based on controls or other limitation devices. This would be the amount of capacity that the project could be studied at—for example the nameplate could be 3 MW, but the system will limit its output to 2.5 MW.

- 2. Systems of less than 100 kW. Is the application process proposed for smaller systems sufficient? If not, please explain and propose additional or different language.**

GMP Response

Yes. Continuing to use the 5.500 application process is sufficient for systems of less than 100 kW.

- 3. Siting provisions for systems of 100 kW up to 1 MW. These provisions treat battery systems differently based on their location, and differentiate non-battery systems from battery systems. Are these provisions appropriate? If not, please explain and provide alternative proposals.**

GMP Response

GMP would like to confirm that the definition for non-battery storage systems is the same as “Energy Storage Facility” with the only difference being the device is not a battery.

- 4. For the systems that qualify for expedited treatment, a CPG must issue on the 46th day following the filing of a petition if a hearing is not needed. In such cases, should the Commission develop a standard set of conditions applicable to all such projects? If yes, please propose appropriate conditions and describe how they should apply to a project (e.g., issuance of a physical CPG for each project, adoption of a general CPG or permit, or inclusion in the rule).**

GMP Response

GMP supports a standard set of conditions. Our focus would be on adherence to Rule 5.500 and applicable standards as outlined in the petition requirements.

- 5. Should an energy storage rule contain any additional interconnection requirements beyond those set forth in Commission Rule 5.500? If yes, why?**

GMP Response

No. Rule 5.500 should govern all interconnection requirements, with the only requested change to the definitions as described above.

6. **What are the correct safety codes or standards that should be contained in an energy storage rule? Should they vary based on the size, location, or type of facility?**

GMP Response

We agree with the proposed rule that includes adherence to the NFPA 855 Standard. Rule 5.500 covers all electrical rule requirements, including any applicable rules based on jurisdiction of the building and applicability of any local regulations.

7. **30 V.S.A. 8011(c) allows the rule to contain provisions that address the respective duties of interconnecting utilities and energy storage owners or operators, including a mechanism for a resolution of disputes. Are these topics appropriate for inclusion in a rule? Are they more appropriately addressed in utility tariffs? If you believe they should be addressed in a rule, please provide proposed language.**

GMP Response

Rule 5.500 provides for interconnection related dispute resolution at section 5.516(F) and this is adequate for interconnection related matters.

8. **What, if any, provisions should a rule contain on the topic of energy aggregators and aggregations? Should the rule address only energy storage aggregators and aggregations, or other aggregators and aggregations as well? Should aggregators be required to obtain a Section 231 CPG? If yes, does the Commission have the authority to impose such a requirement in a rule?**

GMP Response

GMP does not at this time have a position on this question and will review the responses of other participants and provide any further comment as helpful.

9. **What information do interconnecting utilities need to accommodate aggregations? Should a CPG petition include a notice or information on whether the storage system is part of an aggregation? Do utilities prefer that this information be included in the CPG petition process or in the interconnection application process?**

GMP Response

Yes, the CPG petition should include notice if the system is currently or intended to be part of an aggregation. GMP would also request that this be included in the 5.500 application process for

our awareness. This process could be similar to how adding and removing members of Group Net Metering works whereby the aggregator provides notice to the distribution utility of additions or removals from an aggregation.

10. Should a rule establish required practices for the operation of aggregations? If yes, please explain and propose language.

GMP Response

No. Any operating requirements or practices should be captured through the interconnection process.

11. Should the rule contain a provision directing that petitions for Section 248 certificates of public good from non-qualifying facility and non-utility energy storage facility developers also include a request for a Section 231 certificate of public good? If yes, please provide proposed language.

GMP Response

Please see answer to Q9 above.

12. Any other relevant comments or suggestions consistent with 30 V.S.A. §§ 248(u) and 8011.

GMP Response

We have no additional comments.

Thank you for the opportunity to provide information. Please reach out anytime with questions.

Sincerely,



Kamran Hassan

cc: Service list (via ePUC)