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July 12, 2024

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

Re: 21-3883-RULE Proposed Creation of PUC Rule Concerning Energy Storage

Dear Ms. Anderson:

The Commission issued an Order seeking comments on its draft of a rule concerning Energy Storage on May 21, 2024.

Overall, VEC believes the Draft Energy Storage Rule is in great shape. VEC has provided below a few responses to the specific questions posed by the Commission.

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

VEC does not have any additional or modified definitions.

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.

The proposed application process for smaller systems is sufficient.

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.

Yes, these provisions are appropriate.



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).**

VEC supports the development of a standard set of CPG conditions, but does not propose any specific conditions.

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

No, the requirements set forth in Commission Rule 5.500 are sufficient.

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?**

VEC does not propose any additional safety codes or standards beyond those already included.

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.**

It is appropriate for the rule to contain provisions that address the respective duties of interconnecting utilities and energy storage owners and operators. Additionally, the dispute resolution processes outlined in Rule 5.500 are sufficient.

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?**

The Commission should address other aggregators and aggregations, but not necessarily in this rule. VEC believes that the Commission should address other aggregations at some point in the future, as an aggregation of electric vehicles that are vehicle-to-grid enabled would have the same potential impacts to the grid as an aggregation of the storage devices contemplated in this rule.

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?**

In order for VEC to accommodate an aggregation, VEC would like to see the following information submitted:

- Aggregator Name



- Aggregator Contact Information
- Resource Types
- Resource Sizes
- Resource Locations
- Resource Use Cases and/or Intended Market Participation

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

Yes, VEC believes the Commission should establish rules regarding practices for the operation of aggregations. VEC would like those rules to enable visibility into the actions of aggregated resources as well as provide for the potential management of those resources, e.g. in an emergency situation. The rule should also provide discretion to the interconnecting utility as the requirements or desires for interconnection details may vary significantly from utility to utility.

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.

VEC does not take a position on this topic at this time.

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

VEC does not have anything else to add at this time.

VEC thanks the Commission for the opportunity to provide these comments concerning the Draft Energy Storage Rule.

Sincerely,

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