



**State of Vermont
Public Utility Commission**

MEMORANDUM

To: Parties in Case No. 25-0719-TF

From: Andrea Poppiti, Hearing Officer *AP*

Re: Request for Information

Date: May 6, 2025

On April 14, 2025, Green Mountain Power Corporation (“GMP”) filed a petition with the Vermont Public Utility Commission (“Commission”) for approval of the Zone 4 Energy Storage Program Service tariff (the “Zone 4 Tariff”). The Zone 4 Tariff would provide customers in certain geographic areas with energy storage systems with no upfront costs and no lease payments.

Commission staff have conducted an initial review of the tariff filing and request information on the following issues. GMP is requested to respond to the following information requests by no later than May 12, 2025.

1. On page 19 of the prefiled testimony of Josh Castonguay, GMP states that there are “1,200 customers in Zone 4 on these four circuits, spanning approximately 34 rural towns.” Do any of these customers currently participate in any of GMP’s other storage program offerings? If so, will these customers be expected to continue to pay for their storage equipment? Or will they be given the opportunity to shift to the Zone 4 Tariff?
2. On page 24 of Mr. Castonguay’s prefiled testimony, GMP states that it used a 20-year model in the cost-benefit analysis rather than the 15-year model used in GMP’s prior versions of cost-benefit analyses related to energy storage systems. Please provide a cost-benefit analysis of the Zone 4 Tariff using a 15-year model and a narrative describing the different results.
3. Will implementation of the Zone 4 Tariff program be affected by supply chain issues? Does GMP already have energy storage systems on hand? If so, how many of each type?
4. Please describe the potential impacts of federal import duty tariffs on the purchase of equipment and associated materials to implement the Zone 4 Tariff program. Please provide a quantitative analysis that shows how increasing equipment costs would affect the cost-benefit analysis.

5. On page 28 of Mr. Castonguay's prefiled testimony, GMP states that the Zone 4 Tariff proposal is "a lower cost [as] compare[d] to other infrastructure solutions, such as undergrounding." Please provide a quantitative analysis and a narrative explanation to support this statement for the Zone 4 area.
6. On page 29 of Mr. Castonguay's prefiled testimony, GMP states that the Zone 4 Tariff program is opt-in for customers. Please explain how reduced participation would affect the potential benefits. For example, if only 25% of Zone 4 customers ultimately sign up for the tariff, will GMP's customers experience a "cost-shift" as described in question 8 below? Additionally, please provide an update to the cost-benefit analysis to show the potential effects of reduced participation.
7. On page 29 of Mr. Castonguay's prefiled testimony, GMP refers to utility-scale storage, "such as the solar and storage microgrid in Panton." Did GMP consider and analyze using utility-scale storage in Zone 4 as an alternative to the proposed Zone 4 Tariff? Please provide any analysis completed to support GMP's determination to move forward with the Zone 4 Tariff in place of utility-scale storage. If GMP did not conduct such an analysis, please explain why it did not.
8. On page 30 of Mr. Castonguay's prefiled testimony, GMP states that "prioritization of Zone 4 energy storage as a grid asset in select areas is no different than identifying specific line upgrades for priority work in areas showing reliability challenges." GMP goes on to say that "storage is the most effective solution to achieve this and does not result in a cost-shift." Why is it appropriate for customers in other areas of the state to continue to pay for their storage equipment when customers in Zone 4 would receive the equipment at no cost?
9. On page 32 of Mr. Castonguay's prefiled testimony, GMP refers to a "comprehensive report on the status of deployments, customer uptake, customer demographic data along with other agreed metrics." Please provide further details on the type of evaluations GMP will conduct to determine how to prioritize future deployment of energy storage to customers at no cost in other geographic areas. Please also provide more information on the content of the report.
10. Why does the Zone 4 Tariff include a section on the Round Trip Efficiency ("RTE") Credit rather than rely on the Frequency Regulation Rider approved by the Commission in Case No. 24-3111-TF?
11. GMP's existing Energy Storage System tariff includes a provision that eligible customers are current with all payments due to GMP. The Zone 4 Tariff does not include such a provision. Please explain why not.

PUC Case No. 25-0719-TF - SERVICE LIST

Parties:

Malachi T. Brennan
SRH Law PLLC
91 College Street
PO Box 545
Burlington, VT 05401
mbrennan@srhlaw.com

(for Green Mountain
Power Corporation)

Geoffrey Hand, Esq.
SRH Law PLLC
91 College Street
PO Box 545
Burlington, VT 05402
ghand@srhlaw.com

(for Green Mountain
Power Corporation)

Liz Miller
Green Mountain Power
163 Acorn Lane
Colchester, VT 05446
Liz.Miller@greenmountainpower.com

(for Green Mountain
Power Corporation)

Candace Morgan
Green Mountain Power
163 Acorn Lane
Colchester, VT 05446
candace.morgan@greenmountainpower.com

(for Green Mountain
Power Corporation)

*James Porter, Director of Public Advocacy
Vermont Department of Public Service
DPS-PA@vermont.gov

(for Vermont
Department of Public
Service)

*Notice of appearance to be filed.