STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-0867-INV

Vermont Public Utility Commission's order providing guidance for filing documents related to decommissioning securities	

VERMONT DEPARTMENT OF PUBLIC SERVICE COMMENTS REGARDING COMMISSION GUIDANCE FOR FILING DOCUMENTS RELATED TO DECOMMISSIONING SECURITIES

On May 2, 2025, the Vermont Public Utility Commission ("Commission") opened this investigation to provide guidance to certificate of public good ("CPG") holders who are required to file project or facility decommissioning fund securities and related documents (such as reports or fund adjustments) for review and approval per CPG condition(s) and/or the provisions of Rule 5.904. The Commission requested that any comments or recommendations regarding the draft guidance included in the order be filed by May 23, 2025.

The Department of Public Service ("Department") has one recommendation regarding the Commission's May 2, 2025, guidance for the filing of decommissioning securities and related documents but otherwise supports the guidance. Specifically, the Department's recommendation concerns the guidance's instruction that "CPG holders should not file motions asking the Commission to approve initial financial securities, amendments and addenda to previously approved financial securities, or replacements financial securities." While the Department agrees and supports this instruction because it would make the process for review and approval of decommissioning security documents more efficient, it could also create uncertainty and compound administrative burden. To retain the efficiency gained by precluding unnecessary motion practice while also promoting clarity, the Department recommends that CPG Holders be required to include a brief cover letter or summary to accompany its decommissioning security related filings. Such a cover letter or summary should supplement the document title(s) of the accompanying document(s) by briefly explaining: what the filings consist of, what is changing or being requested (e.g., expiration date, issuing bank, dollar amount of fund, new proposed language in security, etc.), and how the filings comply with the conditions of the CPG, Commission guidance,[1] and/or Rule 5.904. Requiring a cover letter would orient the reader to the context of the filings and provide a clear and consistent way to track compliance while also enjoying the efficiency gained by discontinuing motion practice for decommissioning security filings. Thank you, please contact me with any questions.

Dated at Montpelier, Vermont this 23rd day of May, 2025.

/s/ Alex Wing
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cc: ePUC Service List

[1] VERMONT PUBLIC UTILITY COMMISSION, *Decommissioning Securities* (last visited May 13, 2025), https://puc.vermont.gov/electric/letter-of-credit.