



**ALLCO RENEWABLE ENERGY INC.**  
157 Church Street, 19th Floor  
New Haven, CT 06510  
Telephone (212) 681-1120

July 17, 2025

Holly Anderson  
Clerk of the Commission  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620

Re: Case No. 25-1253-INV: Single Plant Comments

Dear Holly:

In response to the Commission's June 30, 2025, Order Opening Investigation and Requesting Comments, Allco Renewable Energy Inc. hereby submits the following proposal for changes to the definition of "plant" in 30 V.S.A. §8002(18):

"Plant" means an independent technical facility that generates electricity from renewable energy. Facilities that use separate generators, inverters, and production meters will each be considered an independent technical facility whether or not such facilities are located on the same or an adjacent parcel. Common usage of utility owned infrastructure or equipment shall not indicate facilities are part of the same plant. A group of facilities, such as wind turbines, shall be considered one plant if the group is part of the same project and uses common equipment and infrastructure such as roads, control facilities, and connections to the electric grid. Common ownership, contiguity in time of construction, and proximity of facilities to each other shall be relevant to determining whether a group of facilities is part of the same project.

This revised definition focuses the "single plant" test on looking no further than the point of interconnection, which is consistent with FERC's approach, ISO-New England and the approach of every other State (except Vermont). All Vermont state incentive programs for renewable energy generation seek to encourage renewable energy development through distributed generation (i.e., generation technologies located close to where the electricity is used). This form of distributed generation provides benefits to the grid by reducing line losses and addressing grid constraints. These programs **encourage** the co-location of generation with load, so the current application of 30 V.S.A. §8002(18) frustrates the purpose of these programs.

In addition, consistency with FERC's approach, ISO-New England and the approach of every other State will encourage outside investment in Vermont by renewable energy developers which is needed to satisfy the recently enacted Renewable Energy Standard in Vermont. That is

especially the case now given the fluctuating whims of the executive branch that are now in play at the federal level in an attempt to kill renewable generation generally. In addition to the enactment on July 4, 2025, of H.R. 1 entitled “An Act to provide for reconciliation pursuant to title II of H. Con. Res. 14,” terminating federal tax credits subject to transition rules, on July 7, 2025, a Presidential Executive Order directs the Secretary of the Treasury to, by August 18, 2025, take all appropriate action to restrict projects in development from qualifying for federal tax credits under those transition rules by restricting use of the current criteria regarding what constitutes the beginning of construction.

The new definition of “plant” in 30 V.S.A. §8002(18) should remove all vague words, concepts and phrases such as “same project”, “proximity”, “ownership”, “contiguity”, “construction” which the PUC has interpreted to mean different things at different times and in different contexts, often applying such varying interpretations retroactively to investments already made.

Sincerely,



---

Michael Melone  
Chelsea Solar LLC  
c/o Allco Renewable Energy Inc.  
157 Church Street, 19th Floor  
New Haven, CT 06510  
212-681-6974  
[mjmelone@AllcoUS.com](mailto:mjmelone@AllcoUS.com)