



October 16, 2025

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 25-1253-INV, PUC Investigation re: definition of single plant pursuant to Act 38 of 2025 and decommissioning financial assurances

Dear Ms. Anderson,

In response to the Public Utility Commission's ("Commission's") October 6, 2025, Memorandum Requesting Comments in this Case, Burlington Electric Department ("BED") submits this letter.

While BED has not provided comments in this case so far on the discussion of single plant criteria for larger 5 MW facilities because such facilities do not exist in Burlington, the Commission's draft recommended language raised one question for BED regarding smaller net metering facilities. Specifically, the Commission's recommendation for an amended definition of "plant" in 30 V.S.A. § 8002(18) includes the following language: "Multiple electricity-generating facilities, regardless of when each is constructed, shall be considered one plant if the facilities use the same electricity-generating technology..."

BED believes that, particularly for small, single-customer net-metering systems, existing or future single plants with two or more electricity-generating technologies should be able to be treated as a single plant to avoid complex administrative and billing issues. For instance, if a BED customer with an existing rooftop solar net-metering facility were to propose amending their facility to add a small wind turbine for a total solar/wind capacity under 15 kw, with the amended facility otherwise meeting the single plant criteria, BED believes such a facility should be treated as a single plant that would receive the same net-metering compensation as under the original Certificate of Public Good, for administrative ease and efficiency of customer billing.

BED respectfully requests that the Commission add clarifying language within the revised "plant" definition to confirm that any existing or proposed net-metering facilities that meet all applicable eligibility criteria under Commission Rule 5.100 will not be prohibited from being considered a single plant by the proposed 30 V.S.A. § 8002(18) "plant" definition.

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Additionally, BED seeks the Commission's guidance on if and how the "same electricity-generating technology" language in the revised "plant" definition will interact with the Commission's net-metering rule 5.109(D) language below:

5.109(D) Effect of amendment on applicable REC and siting adjustors. Except as provided below, the REC and siting adjustors applicable to an amended net-metering system, if any, will be based on the date that the first, complete application or registration was filed with the Commission and not on the date that the amendment request was filed. An amendment or series of amendments that increase the capacity of a net-metering system by more than 5% or 15 kW, whichever is greater, will trigger the application of the most recently adopted siting and REC adjustors to the entire output of the amended net-metering system.

Thank you for the opportunity to provide comments. Please reach out to me with any questions.

Sincerely,



Amber Widmayer
Regulatory Specialist
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