



October 16, 2025  
Ms. Holly Anderson, Clerk  
Vermont Public Utility Commission  
112 State Street, 4<sup>th</sup> Floor  
Montpelier, VT 05602

**Re: Definition of single plant (25-1253-INV)**

Dear Clerk Anderson,

REV offers the following comments in response to the Commission's 10/2/2025 memorandum requesting *Comments on Draft Commission Recommendation on the Definition of "Plant."* REV appreciates the Commission's decision to reject proposed criteria related to preferred siting and grid constraints that would only apply to the second (or subsequent) facility built on a parcel. REV believes that the Commission's decision to maintain consistent standards for facilities regardless of the order in which they are constructed and limiting the criteria in the exceptions to objective characteristics is fundamentally aligned with legislative intent. REV offers three suggestions that we believe would clarify and strengthen the Commission's final recommendation:

**1. Clarify the standard for the co-location of facilities when no facility is a net metered or Standard Offer facility:**

As written, exception (b) appears to allow for the co-location of facilities on a site with a net metered or Standard Offer facility, but not explicitly to allow for the co-location of multiple facilities when no facility is a net metered or Standard Offer facility. The Commission's discussion of this exception on page 5 is focused on ensuring that the combined capacity of facilities participating in these programs at a given site does not exceed a program's statutory cap. Clearly, this would not occur when none of the facilities participate in one of these programs. If the exception is intended to allow for the co-location of multiple facilities when no facility is a net metered or Standard Offer facility, REV recommends altering the language used to describe the exception to make this clear.

If this exception is not intended to allow for the co-location of facilities when no facility is a net metered or Standard Offer facility, REV urges the Commission to create an additional exception that covers this situation. REV does not believe it would serve either ratepayers or land use goals to facilitate the co-location of a PPA facility next to a 2 MW Standard Offer facility, but not the co-location of a PPA facility next to a 2 MW PPA project.

**2. Eliminate aggregate capacity and contiguous parcel language in exception (b)(2)**

While REV understands the Commission's intent to defer to existing Tier II language, we believe that the best outcomes for ratepayers and land use conservation are achieved by providing greater flexibility in locating Tier II resources. As discussed in REV's July 17th filing in this case, many states use other capacity thresholds to define distributed generation. With the phase out of off-site net metering and near-complete utilization of authorized Standard Offer capacity, utilities control the project selection process for Tier II eligible

projects and are the entities in the best position to assess the benefits that facilities provide as distributed generation assets. As such, we believe it would be a mistake to prevent a 5 MW Tier II eligible project from co-locating with an existing 2.2 MW Standard Offer facility if the connecting utility believes the facility would provide the distributed generation benefits that Tier II is intended to capture at the lowest cost to ratepayers.

Further, a restriction on co-location based on parcel contiguity would unnecessarily eliminate otherwise suitable locations from development. Given the large parcel size in parts of the state, this definition would prevent solar even in instances where the facilities would be separated by large distances or geographic features and would otherwise deliver the benefits of distributed generation.

### **3. Clarify the definition of “point of interconnection”**

REV appreciates the Commission’s work to make the exception criteria straightforward and unambiguous. Providing an explicit definition of “point of interconnection” would further this effort. A definition that allows for multiple points of interconnection at the same utility pole would minimize any risk of redundant infrastructure construction.

REV believes that these modifications will result in lower costs for ratepayers and a smaller overall footprint for renewable generating facilities and interconnecting infrastructure.

Sincerely,



Jonathan Dowds