

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 18-1633-PET

Petition of Green Mountain Power Corporation)  
for approval of a multi-year regulation plan     )  
pursuant to 30 V.S.A. §§209, 218 and 218d     )

**VERMONT FUEL DEALERS ASSOCIATION**  
**MOTION TO INTERVENE**

NOW COMES Vermont Fuel Dealers (“VFDA”) and pursuant to Vermont Public Utility Commission (“Commission” or “PUC”) Rule 2.209(B), moves to intervene in the above-captioned proceeding. Grounds for this motion are as follows:

1. Commission Rule 2.209(B) governs permissive intervention in Commission proceedings, and provides:

(B) Permissive intervention. Upon timely application, a person may, in the discretion of the Commission, be permitted to intervene in any proceeding when the applicant demonstrates a substantial interest which may be affected by the outcome of the proceeding. In exercising its discretion in this paragraph, the Commission shall consider (1) whether the applicant's interest will be adequately protected by other parties; (2) whether alternative means exist by which the applicant's interest can be protected; and (3) whether intervention will unduly delay the proceeding or prejudice the interests of existing parties or of the public.

2. VFDA meets the above-standards for permissive intervention in this proceeding and VFDA’s motion is filed on the date set for Motions to Intervene.<sup>1</sup>
3. VFDA has a substantial interest in this proceeding which may be affected by the outcome of the proceeding. A non-profit trade organization, VFDA’s membership

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<sup>1</sup> This Motion is filed on the ePUC web site on August 2, 2018, the date set by the PUC to file motions to intervene. It is filed after 4:30 p.m. on that date because the VFDA did not learn of the case until it was informed by another party late in the afternoon of that day. The VFDA respectfully requests that the Commission accept the Motion.

includes businesses that sell and install heating and cooling equipment in Vermont. VFDA's members provide innovative energy services that are likely to be impacted by the issues that will be addressed in this proceeding. VFDA consistently participates in proceedings before the legislature and Commission regarding energy issues. VFDA has a substantial interest in ensuring that its member companies are not adversely impacted by proposals, positions or actions taken in this docket.

4. Petitioner Green Mountain Power Corporation seeks approval to decouple revenue from sales of heating and cooling equipment from traditional cost-of-service rate regulation. (Prefiled testimony of Mary Powell at 5-6.) Its plan for "multi-year regulation" would depart from present rules governing utility rates. (Id.) These steps could put Green Mountain Power in the competitive marketplace for sales of this equipment while allowing it the potential cross-subsidy of traditional monopoly rate revenue. This, in turn, could result in artificially low pricing of the heating and cooling equipment, creating the illusion that it is less expensive than it would be without the subsidy.
5. VFDA regularly participates in proceedings before the Commission on behalf of its membership and has been granted intervenor status in previous proceedings, bringing the perspective of direct, experienced participants in the Vermont market for heating and cooling equipment.
6. The interests of VFDA are not adequately protected by other parties to this proceeding. The Department of Public Service ("DPS") represents the general interests of the public. VFDA's members have different and unique interests that sometimes differ from those of DPS.

7. VFDA's participation will not unduly delay the proceeding or prejudice the interests of existing parties or of the public.

Dated at Montpelier, Vermont, this 2nd day of August, 2018.

Vermont Fuel Dealers Association

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