

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 18-1633-PET

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

Motion to Intervene

I am seeking Permissive Intervention under Rule 2.209 criteria.

I am a Green Mountain Power customer and Chair of the Town of Hartland Energy Committee. I have signed a contract and put a down payment on the installation of a residential solar plus battery system, with installation expected to be completed no later than the spring of 2019. I also am on a waiting list for a Tesla Model 3 electric vehicle. This GMP multi-year regulation plan will affect whether and how the distributed energy resource (DER) equipment which I will own will interface with the grid through my service provider, GMP, and how the services which I provide will be compensated. It will also affect the speed with which renewable energy and storage is adopted in Hartland, and the quality of the grid services provided to Hartland residents. My interests in this case are:

1. As a future distributed energy resource (DER) owner and as someone who is concerned that Vermont move as quickly as possible to 100% renewable power for the electric grid, my interest is that, consistent with reserving my interests in using my equipment for my personal benefit, the regulatory plan unlocks the full potential of my equipment to provide the many grid services (including but not necessarily limited to transmission congestion relief, transmission deferral, resource adequacy, distribution deferral, frequency regulation, voltage support, black start, spin/non-spin reserves, and energy arbitrage) that grid connected residential and/or vehicle batteries can offer, including those detailed in the Rocky Mountain Institute report from 2015, "[The Economics of Battery Energy Storage: How Multi-Use, Customer-Sited Batteries Deliver the Most Services and Value to Customers and the Grid.](#)" and the Institute for Local Self-Reliance report from 2017 "[Choosing the Electric Avenue: Unlocking Savings, Emissions Reductions, and Community Benefits of Electric Vehicles.](#)" I do not see a clear path toward this outcome in the plan as submitted.
2. Although I am not petitioning to represent the Town of Hartland in this case, as Chair of the Hartland Energy Committee (HEC) I have an individual responsibility to help HEC achieve its mission of assisting residents, businesses, town personnel, and the selectboard in implementing sound economic and environmental energy decisions and helping Hartland reach Vermont's Comprehensive Energy Plan (VT CEP) goals. If

regulatory barriers are removed and with the proper regulatory incentives, investing in small scale DER will make sound economic and environmental sense and will help Hartland reach VT CEP goals. It is in my interest as HEC Chair that this happen. The multi-year regulatory plan as submitted does not guarantee the removal of regulatory barriers which adversely affect these interests.

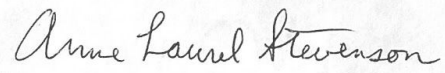
3. Both to protect my financial interests and to promote the achievement of VT CEP goals by providing a range of incentives to those investing in DER equipment so that it is adopted as widely and as quickly as possible, I have an interest in assuring that the rate plan approved can fairly compensate those who invest in DER, commensurate with the ongoing value of the services that their equipment provides rather than in a manner predetermined by GMP. In the plan as submitted, I see no clear path towards this goal for those who wish to maintain full ownership control of their equipment and want to take on the risk of being compensated without subsidy at fair market value for the services their equipment can provide.
4. As a GMP customer who is located at an address and as the chair of a town energy committee in a town that experiences momentary power outages often on a monthly basis and sometimes multiple times per week, and which has recently experienced two outages lasting longer than 4 hours within the span of a month, and where sensitive equipment may have been damaged by poor regulation of grid characteristics (voltage and frequency), I have an interest in improving the quality of grid service in our area.
5. As someone who believes that there is a causal connection between the increasing number of adverse weather events observed over the past decade and greenhouse gas emissions due to human activity, and who believes that methods of petroleum extraction currently in practice have contributed to the aggravation of health conditions which I have experienced, I have an interest in moving electric power generation toward renewable energy sources as rapidly as can be accomplished in an orderly manner.

No other party represents my interests in this proceeding. My interests are specific to my choice to oversize the solar plus battery system which I am purchasing. My purchasing choice results from the unique combination of my interests, including my interest in becoming fully energy independent from fossil fuel immediately, my interest in fully sharing the benefits of my system with my community and with GMP, and my financial interest in being fairly compensated for the services which my system can provide rather than in unduly bearing the financial burden of or in receiving a subsidy for the contribution which I am offering.

Additionally, I respectfully request that the PUC accept this application late. No party will be prejudiced by accepting this intervention late, and as a party I will be bound by the schedule as it exists now. Accepting the late intervention will not delay the proceeding in any way.

I certify that the information provided in this submission is true and accurate to the best of my knowledge.

Respectfully submitted this 24th day of August in Hartland, Vermont,

A handwritten signature in cursive script that reads "Anne Laurel Stevenson". The signature is written in black ink on a light-colored, slightly textured background.

Anne Laurel Stevenson

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