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January 18, 2019

Judith Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street  
Montpelier, Vermont 05620-2701

filed via ePUC

Re: 18-3810-INV, Investigation into Renewable Energy Standard Rulemaking

Dear Ms. Whitney:

This letter responds to Public Utility Commission (“Commission”) Staff Attorney Elizabeth Schilling’s Memo dated December 12, 2018 inviting participants to respond to the comments made and issues raised at the workshop as well as the written comments filed prior to the workshop by the Vermont Department of Public Service (“DPS” or “Department”) in a letter dated December 5, 2018, and by William F’ Scully in a public comment dated December 10, 2018. Green Mountain Power (“GMP”) is pleased to provide its comments.

### **Response to DPS Comments**

- **All Tiers**

In its December 10, 2018 letter, the DPS suggested there be a consistent process and dataset from utilities to facilitate streamlined and transparent analysis of RES compliance for all Tiers. The Department provided a template of data it considers necessary for evaluation of each tier. Efficiency and transparency are best for customers, and GMP is reviewing and will provide feedback to the Department on its template.

- **Tier III**

With regard to Tier III, the DPS had many helpful suggestions which GMP supports including that utilities include a consistent summary table to facilitate review and comparison of the annual plans and to provide expected load impacts from Tier III offerings in annual plans. GMP already provides information on the load impact of its projects in many forms including our Integrated Resource Plan and in Tier III filings. GMP is interested in learning more about the Department’s recommendation that utilities use a consistent practice to define and calculate administrative costs. It will be important to remember there are substantial differences in the scale and focus of programs from utility to utility which may well account for, and even require, differences in accounting for administrative costs.

Finally, the DPS recommended Commission approval of Tier III annual plans. Utilities must be able to continue to be flexible and nimble to test programs, learn what works for customers in this new energy landscape, what doesn't, to quickly make changes for the benefit of all of our customers. Imposing this process may slow things down and avert the focus away from program design and implementation to process that may not add value and make it difficult to implement new programs and third party offerings throughout the year. Alternatives to a formal approval process might be mid-year check-ins with the Department to review program changes and a consistent template for the Tier III plans. GMP is happy to work with the Department further on this issue.

- **Rulemaking Process**

The Department also made recommendations on the rulemaking process including publication of a draft rule by April 1, 2019 to allow for feedback and revisions before formal rulemaking begins on July 1, 2019; scheduling of workshops with comments designed to have discussion and review to minimize late-process revisions; and, where appropriate, broadly articulated rules that allow for further refinement over time with the benefit of experience given how early in the lifetime of the RES program we are. GMP supports these recommendations.

### **Hydro-Quebec and New York Power Authority RES tracking – DPS and William Scully Comments**

Mr. Scully filed comments on December 10, 2018 and attached a memo regarding potential challenges in Massachusetts with New York Power Authority (“NYPA”) attributes. GMP does not presently use NYPA attributes for its RES compliance (and NYPA power is a very small portion of GMP’s power supply) so has no comment on Mr. Scully’s filings at this time. In its December 5, 2018 comments, the DPS suggested additional efforts be made to ensure appropriate tracking of RES compliance attributes associated with imports from external control areas. The Commission addressed the tracking requirements for attributes from external control areas in its March 15, 2016 order in Docket No. 8550 (“Order”). In that Order, the Commission recognized the NEPOOL GIS did not, at that time, have the capability to accurately track environmental attributes associated with system imports from adjacent control areas, and adopted the DPS recommendation on how utilities should account for these attributes in their RES compliance filings.<sup>1</sup> The environmental attributes from HQ and NYPA power purchases are to be tracked separately from the NEPOOL GIS until the capability is developed to track unit-specific attributes associated with system imports within the NEPOOL GIS. For HQ attributes, which GMP uses for RES compliance, the Order requires utilities to document the amount of MWh generation purchased from HQ as tracked in the NEPOOL GIS and then multiply this amount by the percentage of renewable energy contained in the HQ attestation form to determine the renewable power available for compliance with the RES. Utilities also are required to provide appropriate documentation to demonstrate that the power purchased is eligible for the RES, including the fuel source utilized and whether the attributes have been claimed by any other party or in any other jurisdiction.<sup>2</sup> GMP has followed this process in its RES compliance filings. Since the NEPOOL GIS still does not have the capability to accurately track environmental attributes for system imports from HQ, we recommend the rule incorporate the requirements set forth in the Order.

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<sup>1</sup> Order at 5-6

<sup>2</sup> Id, at 6.

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Thank you, and if you have any questions, please feel free to reach out.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carolyn B. Anderson". The signature is fluid and cursive, with the first name being the most prominent.

Carolyn Browne Anderson

CBA

cc: ePUC Service List (electronic only)