



Washington Electric Cooperative, Inc.

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19 January 2019

Ms. Judith Whitney, Clerk
Vermont Public Utilities Commission
112 State Street
Montpelier VT 05620-2601

filed via ePUC

RE: 18-3810-INV-RES Rulemaking

Dear Ms. Whitney:

Washington Electric Co-op ("WEC") hereby responds to the Public Utilities Commission ("PUC") memo of 12 December 2018 requesting parties to respond to comments and issues at the workshop, as well as those filed subsequently by parties.

WEC joins with BED & VPPSA in their support of consistency, transparency and accuracy around the Renewable Energy Standard ("RES"), and the file format proposed by the DPS for reporting.

Regarding the issue of administrative costs, their definition and the level of detail provided, WEC shares the concerns raised by VEC and others that a per measure allocation of the administrative costs is an exercise without value. WEC believes that its administrative time on all elements of supporting the objectives of Act 56 through is prudent and reasonable. We share GMP's observation there are multiple methods to account for administrative time and expense, and we wish to avoid creating more administrative burden to our staff for Tier III programs.

Trying to itemize staff time by individual Tier III measures would be an exercise without value. WEC believes in a portfolio approach in its Tier III program design, where the member is offered multiple opportunities to make fossil fuel reduction through conservation, efficiency and new forms of heating and transportation. While we are open to providing the DPS with additional details as to administrative work and tracking of time and expenses related to Tier III activities, WEC objects to creating mandates and requirements.

On the matter of the approval of a DU's filed program design, WEC believes there are tools and the means to allow for the DPS to raise concerns, under existing statute and rule and as such requirement for approval is unnecessary. There should be a rebuttable presumption of any proposed program design, and a clear and timely process for the DPS to have their questions answered, and revised program designs negotiated by both parties.

For WEC's specific case moving the filing date two weeks earlier than the current 1 November date, would increase the gap between what WEC plans for the following year, and what results in the current year may portend for the new year. WEC shares its savings with Efficiency Vermont, and as such WEC is dependent upon EVT to provide tracking data so that WEC can report its share of savings, which in turn affects plans for the new year. An earlier filing date would make the time gap larger, while leaving WEC

still having to wait until the calendar ends (and further into the new year) before its full program savings and costs are able to be reported.

In regards to the rulemaking process, the DPS recommends publishing a draft rule by 1 April 2019, and workshops before the formal process begins on 1 July 2019. WEC supports the DPS's recommendations in this matter.

WEC appreciates this opportunity to share its concerns about the Tier III process, and looks forward to a useful rule-making schedule and outcome.

Please contact me if there are questions.

Sincerely,

A handwritten signature in black ink that reads "Bill Powell". The signature is written in a cursive, slightly slanted style.

William Powell
Director, Products & Services

Filed via ePUC.