

State of Vermont
Department of Public Service
112 State Street
Montpelier, VT 05620-2601
<http://public.service.vermont.gov>

[phone] 802-828-2811
[fax] 802-828-2342
[tdd] 800-734-8390

This document was electronically filed using ePUC

February 19, 2019

Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Floor 4
Montpelier, Vermont 05620

**Re: Public Service Department Comments in Renewable Energy Standard Rulemaking
Docket Following January 29, 2019 Workshop**

Dear Ms. Whitney:

Following the January 29th workshop, the Department of Public Service scheduled a meeting with stakeholders for March 19, 2019 to address the following topics:

- The RES data collection and compliance spreadsheet;
- Summary table to be used for Tier 3 plans and reports;
- Clarify what should be included (and purpose of) load growth estimates related to Tier 3 projects – one year vs. 20-year, etc.;
- Define what should be included in Tier 3 administrative costs and attempt to achieve consistency across utilities;
- Tier 3 customer project transparency, including during the development process and during the compliance process and how to handle confidential data;
- Clarify analysis for insuring that the project “meets the need for its goods or services at the lowest present value life cycle cost, including environmental and economic costs” and including consideration of alternatives that do not increase electricity consumption;
- Identify what approval of Tier 3 plans would mean and what it would cover.

The Department will file information on these topics within three weeks after the meeting. The remainder of this letter addresses other topics discussed in the January 29th workshop.

RES Qualification Registration

On February 13, 2019, the Department and the Public Utility Commission participated in a phone call with NEPOOL GIS to gain a better understanding of its processes. Based on that call and a subsequent conversation, it was determined that the Commission and the Department are duplicating efforts in reviewing the RES qualification registrations. Therefore it is proposed, after conferring with the Commission, that the rule not require the registrations be submitted to the Department, and that the registrations only be reviewed the Commission. The Department would instead audit reported generation.

The Commission has stated it would like to review the registrations in bulk on a monthly basis. The Department suggests the following schedule: registrants who file complete and accurate registration forms by the 15th of the month will have their registrations approved in bulk at the latest by the 1st of the following month. To illustrate, a registrant who files by April 15 would have its application approved in bulk no later than May 1, provided all required information was accurately provided. This information would then be promptly transmitted to NEPOOL GIS, so the applicant could be identified as “qualified” in NEPOOL GIS by the 10th of that month (e.g., May 10 in the example).

While there was discussion of having the Commission’s bulk review track the NEPOOL GIS calendar,¹ the Department asserts that this is no longer necessary since the Commission intends to conduct monthly rather than quarterly reviews. The form could include an explanation of how the Commission’s review aligns with the NEPOOL GIS calendar, such as by including the attached Table 1.

Information to be included in Forms

The Commission asked the Department to review the RES Implementation Order and identify sections that are “too prescriptive” which can be included in forms or templates rather than in the rule.

The Department maintains that all fields in the compliance spreadsheet and the Tier 3 plan summary table should be left to a form. This permits the Commission to remove fields that prove to be unnecessary or unworkable.

The Department previously commented that the information required to qualify a facility for the RES should be included in a form.² The Department proposes that the RES qualification form require the applicant provide the CPG number and that net-metering projects provide evidence that they retained the renewable energy credits. Similarly, the Department contends that information included in a utility’s list of aggregated facilities should be identified in a form.³ Some of the now-required information, such as the facility’s equipment, is not always available to the utility. CPG information is now required, yet this information is difficult for the utility to track. Therefore the utilities, the Department, and the Commission are working together to create a nexus among a facility’s CPG number, interconnection date, and REC output.

¹ See <https://www.nepoolgis.com/>.

² See Order Implementing the Renewable Energy Standard, slip. op. at 66, Section VII.3(a)(i), *Investigation Re: Establishment of the Renewable Energy Standard Program*, Docket 8550 (Vt. P.S.B. June 28, 2016).

³ See *id.* at 67, Section VII.3(c)(ii).

Sincerely,

/s/ Allison Bates Wannop
Special Counsel

cc: ePUC Service List

TABLE 1

Generation Month	Last Date to Submit to Commission To Qualify for Quarter	Last Date Registration would be approved and transmitted to NEPOOL GIS	Last Day to Submit MWh, Import Claims, Emissions, RPS Eligibility⁴	Issuance Date	First Day of Trading Period	Last Day of Trading Period	Quarter
January	June 15	July 1	July 10	July 15	July 15	September 15	1
February	June 15	July 1	July 10	July 15	July 15	September 15	1
March	June 15	July 1	July 10	July 15	July 15	September 15	1
April	September 15	October 1	October 10	October 15	October 15	December 15	2
May	September 15	October 1	October 10	October 15	October 15	December 15	2
June	September 15	October 1	October 10	October 15	October 15	December 15	2
July	December 15	January 1	January 10	January 15	January 15	March 15	3
August	December 15	January 1	January 10	January 15	January 15	March 15	3
September	December 15	January 1	January 10	January 15	January 15	March 15	3
October	March 15	April 1	April 10	April 15	April 15	June 15	4
November	March 15	April 1	April 10	April 15	April 15	June 15	4
December	March 15	April 1	April 10	April 15	April 15	June 15	4

⁴ This is the date by which NEPOOL GIS should reflect that the facility has been approved by Vermont for purposes of qualifying for the RES.