

May 2, 2019

Public Utilities Commission
c/o of Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05702
(Filed electronically via ePUC)

RE: State of Vermont Public Utility Commission Case #19-0855-RULE

Dear Commissioners:

The Chittenden County Regional Planning Commission (CCRPC) is providing these written comments in response to the Public Utility Commission Order initiating a proceeding to review Commission Rule 5.100, which governs the construction and operation of net-metering systems and the Commission's draft of potential changes to Rule 5.100. We appreciate the opportunity to comment on the draft changes to Rule 5.100 and on the questions raised in the order opening investigation.

The Commission's order seeks comments on whether there should be a registration process for obtaining a CPG for a solar canopy over an existing parking lot, such as the current process for rooftop systems.

CCRPC supports a registration process for solar canopies over parking lots. The addition of a solar canopy does not increase the environmental impact of a parking lot that already exists or has been permitted, and removing barriers for these systems will help Vermont meet its renewable energy goals. To ensure that this registration process mirrors the process for solar on existing structures, CCRPC encourages the Commission to consider whether it would be appropriate to waive the setback requirements for solar canopies. Many existing parking lots are located within the setbacks required by Section 5.113 of the Net Metering Rules.

Section 5.129(D-E) of the draft rules allow up to 500 kW of cumulative capacity of net-metering systems to be attributed to an individual or a group, removing the need for Commission approval for multiple systems attributed to a single group.

We encourage the Commission to use this rulemaking process to investigate whether this limit should be raised or eliminated for large electricity users. This limit on group net metering especially impacts entities with multiple facilities (e.g. school districts, municipalities and state agencies).

The draft rule (pg. 10-11, Preferred Site Definition 7) eliminates the option for a preferred site to be identified through a "joint letter of support from the municipal legislative body and municipal and regional planning commissions in the community where the net-metering system will be located."

CCRPC strongly opposes this change. It is imperative to allow municipalities and regions to designate preferred sites without amending the municipal plan. Instead of eliminating this

option, the “joint letter of support” should be replaced with language allowing municipalities and regions to define a preferred site based on the policies in their respective plans, and to clarify that the specifics of a project will be subject to additional review when more details are provided in a site plan.

Thank you for this opportunity to comment and we look forward to reviewing further drafts of Rule 5.100. We understand that this investigation is ongoing, and we may submit further comments as the process continues.

Please let me know if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in blue ink that reads "Charles L. Baker". The signature is written in a cursive style.

Charles Baker
Executive Director