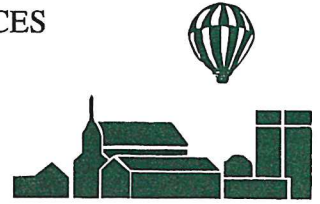




TOWN OF HARTFORD
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May 17, 2019

Ms. Judith Whitney, Clerk
Vermont Public Utility Commission 112 State Street
Montpelier, VT 05702

RE: Case No. 19-0855-RULE, Proposed revisions to Vermont Public Utility Commission Rule 5.100

Dear Commissioners:

The Town of Hartford is providing these written comments regarding the proposed revisions to Vermont Public Utility Commission Rule 5.100. The Town is specifically commenting on Section 5.103's definition of "preferred sites."

Hartford began working on its Enhanced Energy Plan in 2017. The Town has gone through a thorough process of internal review and public engagement, and after several revisions, the Enhanced Energy Plan is now being reviewed by the Selectboard for approval as part of the updating the current Town. This process was extremely valuable to the Town's energy planning process, and allowed the Town to systematically evaluate its preferences for renewable energy siting. While the Enhanced Energy Plan is a needed tool for increasing local control over the location of preferred sites, it should not serve as the only mechanism for making these designations. The proposed Rules' elimination of the option to classify preferred sites through a joint letter between the municipality and regional planning commission presents a significant challenge to Hartford's ability to promote needed renewable energy advancement.

The development of the Enhanced Energy Plan has been a multi-year process. Should a site not be identified as preferred in the current plan, the Town would have to wait years to go through the process of making it preferred, significantly delaying climate action and the Town's progress towards its energy goals. The joint letter provision allows the Town to be nimble in response to the identification of a site that aligns with the Town's vision for renewable energy siting, yet is not identified as preferred in the Town Plan.

Hartford was intentionally restrictive in designating preferred sites, with the goal of encouraging development on rooftops and impervious surfaces before developing in other areas of Hartford. Nonetheless, other sites will likely be identified that do not meet one of Hartford's seven preferred locations, yet align with Hartford's overall renewable energy development strategy. The joint letter is a needed complement to Hartford's Town Plan.

Finally, despite the Town's thorough process for developing siting criteria, there are inevitably stakeholders that were unable to participate in the outreach process. The joint letter gives Hartford the ability to adjust its preferred siting policy in response to future public input.

Thank you very much for your consideration. Please feel free to contact me if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Geoff Martin
Energy Coordinator
Town of Hartford