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This document has been filed in ePUC

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

Re: Case No. 19-0855-RULE; Proposed Revisions to Vermont Public Utility Commission Rule 5.100

Dear Ms. Whitney:

On April 16, 2019, the Vermont Public Utility Commission (the “PUC” or “Commission”) issued an Order opening a proceeding to review Commission Rule 5.100, and included with that Order, a draft of potential rule changes. The Commission requested comment on the draft rule, the issues addressed in the Commission’s April 16 Order, process for this proceeding, and any other issues that participants wish to have addressed.

Green Mountain Power (“GMP”) appreciates the opportunity to provide comment in this proceeding, and to provide perspective and insight with respect to changes to Rule 5.100. The following comments are organized by subject areas identified in the Commission’s Order:

1. Efforts to Streamline Net Metering Process

GMP is supportive of streamlining the net metering process, including changes that would create fewer forms, narrow the types of projects that require action on the part of the Commission, and which would result in fewer requests for additional time to complete commissioning. We believe that rule changes such as those proposed by the Commission can lead to efficiencies for everyone, saving time, money and effort. One example pertains to net metering record keeping; where the transfer of a net metering project to a new owner is permitted without Commission action, GMP would propose that notice of the transfer is provided to *both* GMP and the Commission, so that there is one system of record to consult for ownership history of a project¹.

¹ See proposed revision to section 5.110(A)

2. Preferred Sites

GMP was pleased to participate in the Commission's Preferred Siting workshop proceeding. It was very helpful to understand the views of a wide array of stakeholders, including the Department of Public Service (the "Department"), utilities, planners, and the development community. We appreciate changes to the rule that provide clarity to the criteria for a preferred site designation, and we foresee no concern with preferred sites within a constrained area, in that all projects undergo a review process and would be subject to the same interconnection criteria.

The Commission has raised the issue of tree clearing, and GMP agrees this is good to consider, especially when it comes to availing a project with the benefit of a preferred site designation. Climate change impacts are increasing, and cutting carbon is critical to our customers and our state - and we need to make good choices when the opportunity arises to cut carbon. For these reasons, we would agree that a review of the impacts that tree clearing might have in the context of a preferred site designation would be of value.

3. Interconnection

Over time, GMP has noted areas for improvement to net metering registration and application forms. Some examples include designation of single phase vs. three phase service, size and quantity of inverters, and requested point of interconnection. This information can be very helpful to the study process, helps to avoid confusion, and having it up front makes the interconnection process more efficient. While we support a unified and simple process, we would like to see further exploration of the implications to workload and the interconnection queue, that might result from requiring a 5.500 interconnection application for all ground mounted projects over 50 kW².

4. Rates

GMP appreciates a thoughtful focus on understanding impacts for customers. In this time of climate change, our energy future must be reliable, cost-effective and continue to move to a home, business, and community energy system. We look forward to providing information to help the Commission keep Vermont's net-metering program sustainable for everyone.

5. Other

Existing net metering sites - GMP suggests adding a provision to the net metering rule that addresses existing net metering sites, and the applicable rates and incentives to replacement systems installed on an existing site. As Vermont's net metering program ages, so do the net metering systems of early adopters. We expect to see an increase in system replacement, and expect the question of rates and incentives will arise as this occurs.

2 See proposed revision to section 5.107(C)(10)

Process:

GMP proposes a series of workshops to discuss stakeholder questions and ideas, followed by multiple comment filings, such as: (1) round of general comments; (2) workshop discussion on parties comments; (3) 2nd round of comments including redline/strikeout of the current rule; (4) 2nd workshop to discuss stakeholders redlines and understand/reconcile differences; (4) 3rd round of comments, including redline/strikeout of the current rule; (5) PUC issues 2nd draft of Rule; and (6) 4th round of comments.

Conclusion

We are pleased to participate in this proceeding and look forward to collaboration with stakeholders toward the best solutions for Vermonters. Thank you for the opportunity to comment, and if you have any questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Melissa Stevens". The signature is written in a cursive, flowing style.

Melissa Stevens
cc: ePUC Service List