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May 24, 2019

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

Re: Case No. 18-3810-INV – SED Comments on draft proposed Renewable Energy Standard (“RES”) Rule

Dear Ms. Whitney,

The Town of Stowe Electric Department (“SED”) submits the following comments in response to the Order requesting comments issued by the Public Utility Commission (“PUC” or “Commission”) dated May 2, 2019.

#### Section 4.406 – Tiers I and II Qualification of Generation Facilities

Section 4.406(d) deals with the aggregation of facilities that qualify for RES Tier I or II as a single facility in order to count the associated renewable attributes towards a distribution utility’s (“DU”) targets, such as a group of net-metered facilities. The PUC has recommended that a DU provide a list of easily compiled information on these facilities, namely the location address, capacity, in-service date, fuel source, and certificate of public good number, as well as “any other information requested by the Commission.” When SED applied to qualify its aggregated net-metering facilities prior to this proposed rule, it was requested that SED submit more detailed information such as personally identifiable information (“PII”) of the owner of the net-metering facility. Though CPGs and the associated information are part of the public record, SED takes efforts to not distribute its customers’ PII unless explicitly required. Prior aggregation applications and quarterly updates also required SED to submit the make, model,

and number of PV modules and inverters. These data fields were answered using the information submitted with the facility's registration or application form, when available. Although a net-metering customer must file for an amendment when proposing to change the total capacity of their facility, that is not necessary when making modifications to the make or model of the equipment used in the final construction and would arguably be burdensome for installers. But this also raises the possibility that the system information submitted by the DU for the purposes of qualification under this section is inaccurate.

SED is requesting clarity from the PUC as to whether 4.406(d)(1)(A)(vi) will require the DU to continue to provide PII and system equipment information. This would also indirectly affect the two most common amendments to net-metering systems that SED has seen and reported on in prior quarterly updates: changes in system capacity and changes in ownership.

#### Section 4.421 – Update of Annual Compliance Rates

SED suggests a modification of the language in this section to clarify that the annual announcement of the alternative compliance rate would be applicable to the following compliance year.

“Pursuant to 30 V.S.A. § 8005(a)(4)(B), annually on or before September 1, the Commission shall announce the applicable alternative compliance payment effective ~~the~~ for the following ~~January 1 compliance year.~~”

#### Tier III Energy Transformation Definitions

There is inherent value in clearly defining measure, project, or program as recommended by the Department and adopted by the PUC in the draft rule. SED notes that the PUC did not elect to incorporate the Department's definition of an “Energy Transformation Portfolio” among these definitions. As these definitions describe the relationship between the different subcategories within a DUs energy transformation efforts, SED believes it would be

useful to have a standard term that all parties involved could refer to when speaking of the suite of programs offered by an organization.

A handwritten signature in black ink, appearing to read "Matthew DS Rutherford", with a long horizontal stroke extending to the right.

Matthew DS Rutherford  
Manager of Regulatory Compliance  
Town of Stowe Electric Department