

July 7, 2020

Filed via ePUC

Judith C. Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street - Drawer 20  
Montpelier, VT 05620-2701

RE: Case 20-0789-INV- interconnection agreement execution deadlines  
Response to Commission's Order Requesting Comments on Responding to Request for  
Waiver of Commission Rule 5.508(B) for Certain Execution Deadlines

Dear Ms. Whitney:

In its order, dated June 18, 2020, the Public Utility Commission (Commission) requested that the Vermont electric distribution utilities file public comments by July 9, 2020, responding to a request to waive Commission Rule 5.508(B) for those interconnection agreement execution deadlines that fall on or after March 25, 2020, through December 31, 2020. This filing represents the response of the 11 municipal utility members of Vermont Public Power Supply Authority (VPPSA).

The VPPSA member utilities generally do not have any issue with the Commission granting the requested waiver.

VPPSA recommends that any extension to the interconnection agreement ("IA") execution deadline be established in order to maintain the pre-COVID19 length of window between IA execution and commissioning deadlines. While initial queue position is established by original application date, and the VPPSA utilities do not foresee any conflict or problem with the utilities' process or management of the queue, VPPSA recommends the Commission articulate a requirement that the relative queue position of affected projects be maintained.

Utilities have been asked to answer the following questions:

- *What effect would granting the requested waiver have on the interconnection process, including the utilities' performance of studies for future projects and on the utilities' management of their interconnection queues?*

The VPPSA utilities do not anticipate that granting the waiver would have any adverse effects on their interconnection process. All required studies are generally performed, and agreement is reached with respect to the cost of required upgrades, prior to the start of the one-year clock for IA execution. If the period between IA execution and commissioning deadline is maintained, and the original queue order is respected, managing the queue appropriately should not pose a problem.

- *Could the issue raised by Triland also be addressed by extending the deadline for commissioning a facility that has an executed interconnection agreement? What would be the ramifications of extending the commissioning deadline as opposed to the interconnection agreement execution deadline?*

VPPSA utilities believe that if the commissioning deadline is extended, the interconnection agreement execution deadline should be extended, in lockstep, and vice versa, during the uncertain times of the COVID-19 pandemic.

- *What are the utilities' current practices with respect to interconnection agreements whose facilities are not commissioned within one year of the agreements' execution as a result of the COVID-19 pandemic?*

VPPSA utilities would be reasonably flexible on deadlines relative to projects impacted by the COVID-19 pandemic.

- *What effect do these practices have on a facility's interconnection queue position?*

VPPSA utilities do not anticipate that these practices would have an adverse effect on a facility's interconnection queue position as long as the various deadlines are modified as discussed above.

- *Do the utilities need authority from the Commission to address the issue raised by Triland or do the interconnection agreements' standard terms and conditions allow the issue to be addressed?*

While the *interconnection agreements' standard terms and conditions may be adequate*, VPPSA utilities feel that confusion with respect to administration of the process will be minimized if the Commission issues standardized requirements to extend all the related deadlines in lockstep.

- *Are there any other factors that the Commission should consider when evaluating Triland's request?*

VPPSA utilities believe that we need to ensure that the allotted time that utilities have to appropriately evaluate and plan for these projects is not shortened by shifting timelines.