



VILLAGE OF HYDE PARK

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July 9, 2020

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

Dear Ms. Whitney:

Hyde Park Electric files these public comments in response to the order of the Public Utility Commission dated June 18, 2020. Hyde Park Electric has no issue with the granting of the requested waiver. Our responses to questions asked of utilities follows:

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?

Hyde Park Electric does not see a direct effect to the granting of the requested waiver on its interconnection process, including performance of studies for future projects and on our management of our interconnection queues.

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?

Generally, Hyde Park Electric believes it important to keep the two in tandem. If the deadline for commissioning a facility is extended and that facility has an executed interconnection agreement, the extension should apply to the interconnection agreement, requiring an updated engineering analysis that could require a new interconnection

agreement. Ramifications could extend to system reliability and added cost borne by ratepayers. The extent of the ramifications would depend on the changes to the electric system that occur during extended time gap between the interconnection agreement deadline and commissioning..

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?

Hyde Park Electric will be reasonable in the event that a facility is not commissioned within one year of the agreements' execution as a result of the COVID-19 pandemic.

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

During COVID-19 pandemic, we are can be flexible. Once the pandemic state of emergency has ended, Hyde Park Electric does not believe that ratepayers should be exposed to the risk of a facility maintaining its queue position beyond the commissioning deadline. The interconnection agreement and commissioning deadline should be in tandem. If the commissioning deadline is not met for any reason, queue position is forfeited. This point should begin new engineering analysis to determine impacts to the electric grid.

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?

Hyde Park Electric believes that clarification and standardization of in tandem deadlines will be beneficial.

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

No.

Respectfully submitted,
VILLAGE OF HYDE PARK, INC.

By: *Carol Robertson*

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