

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 20-0789-INV

Vermont Public Utility Commission orders  
and memoranda issued in response to  
COVID-19 pandemic

COMMENTS OF VERMONT ELECTRIC COOPERATIVE, INC.

Pursuant to the Order Requesting Public Comments issued on June 18, 2020, Vermont Electric Cooperative, Inc. (VEC) submits the following responses to the questions posed by the Public Utility Commission (the Commission).

1. 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?

*VEC does not believe granting the requested waiver will have an effect on our interconnection process since we do not require that a project be commissioned within one year of executing an interconnection agreement. VEC requires only the execution of the agreement prior to commissioning.*

2. 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?

*The commissioning date is generally determined by the developer. VEC may determine this date if prior arrangements have been made by both parties, for example, where VEC has a purchase power arrangement for the project being developed, but generally the commissioning date is driven and controlled by the developer and not VEC. VEC works to accommodate the developer's chosen commissioning date.*

3. 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?

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*VEC has not had a circumstance where a facility has not been commissioned within one year of the interconnection agreement. VEC requires an executed interconnection agreement prior to commissioning and generally, the interconnection agreement is signed shortly before construction begins. Currently, VEC has signed interconnection agreements for two pending projects and both of those are expected to see completion before the one-year deadline.*

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

*The queue positions are based on application date and therefore these practices would not affect the facility's interconnection queue position, particularly for net-metering projects. VEC believes that there may be more of an issue for standard offer projects in light of the bidding process. VEC uses the same interconnection process for both net metering and standard offer projects.*

5. 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?

*No. VEC believes the standard terms and conditions for interconnection would apply.*

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

*No.*

Thank you for the opportunity to comment.

Dated at Essex, Vermont, this 9th day of July, 2020.

Respectfully submitted,

VERMONT ELECTRIC COOPERATIVE, INC.

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