



Washington Electric Cooperative, Inc

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Ms. Judith Whitney, Clerk
Vermont Public Utilities Commission
112 State Street 4th Floor
Montpelier VT 05620-2701

10 July 2020

RE: Case No. 20-0789-INV; Order of 6/18/2020, seeking comments responding to request for waiver of Commission Rule 5.508(B) for certain execution deadlines.

Dear Ms. Whitney:

Washington Electric Co-op ("WEC") hereby provides its comments and answers to the Commission's request for comments in Case no. 20-0789-INV.

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

The requested waiver to extend the current one-year period for interconnection, to accommodate factors beyond a project's control causing delay beyond that statutory period, would not have an effect on WEC's process.

WEC supports the requested waiver and the Triland request to allow a pending generation interconnection agreement (GIA) to be extended to the same time line provided by the PUC for pending net metering registrations.

Could the issue raised by Triland also be addressed by extending the deadline for commissioning a facility that has an executed interconnection agreement?

Yes, WEC supports this resolution.

What would be the ramification of extending the commissioning deadline as opposed to the interconnection agreement execution deadline?

One consequence would be to cause projects to be in the same situation as Triland is describing. As Triland has stated, the interconnection requires a one year completion absent the requested waiver; accommodating the statutory period without also causing or directing the distribution utility to

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simultaneously adjust the GIA in a similar manner would result in the two time driven processes to not be aligned for milestone dates, including the project commissioning date.

WEC believes the solution is to allow both registration and GIA to be extended simultaneously.

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 C19 pandemic?

WEC believes until the PUC directs otherwise, our practice is to enforce the deadlines currently in rule.

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

WEC has no experience where the proposed net metering facility's position in the interconnection queue has been adversely affected by the March Order.

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

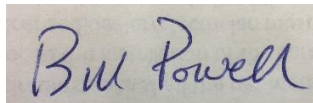
WEC supports the PUC directing the same extension relief for the registration as for the GIA.

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

Not at this time.

Please contact me if there are questions.

Sincerely,

A rectangular box containing a handwritten signature in blue ink that reads "Bill Powell".

William Powell
Director, Products & Services.

Filed by e-PUC