



July 14, 2020

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

Re: Case No. 20-0789-INV, Vermont Public Utility Commission orders and memoranda issued in response to COVID-19 pandemic

Dear Ms. Whitney,

Burlington Electric Department ("BED") submits the following responses to the Public Utility's ("PUC") June 18th, 2020 Order Requesting Public Comments Responding to Request for Waiver of Commission Rule 5.508(B) for Certain Execution Deadlines. We note that in this Order, the PUC requested responses by June 9th, 2020. We apologize that we did not submit our comments by that date and request that the PUC accept our comments for consideration.

BED's responses to the PUC's June 9th, 2020 Order questions are as 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?*

BED currently has no pending interconnections requiring interconnection agreements and we do not anticipate a significant increase in such interconnection requests in the future. Consequently, granting Triland's request for an extension of the interconnection agreement execution deadline would not have a substantive impact on BED's management of its interconnection queue.

- *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?*

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It is BED's understanding that extending the commissioning deadline within Triland's interconnection agreement would accomplish the same goal as extending the interconnection agreement execution deadline. As BED has no pending customer interconnections with interconnection agreements, doing so would not result in any substantive impact for BED.

- *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?*

BED does not have any interconnection review practices specifically related to delays due to COVID-19. As mentioned above, we do not currently have any customers with pending interconnections that require interconnection agreements.

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

N/A

- *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?*

In the absence of a statutory or PUC regulatory provision governing a particular term or condition of an interconnection agreement between a utility and its customer, it does not seem that PUC authorization would be required in order to change that term or condition. However, we defer to PUC's discretion on this question.

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

Not at this time.

We appreciate the opportunity to provide comments. If you have any questions, please do not hesitate to contact us.

Sincerely,



Amber Widmayer
Regulatory Specialist
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