



## Washington Electric Cooperative, Inc.

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Ms. Holly Anderson, Clerk  
Vermont Public Utility Commission  
112 State Street, Drawer 20  
Montpelier VT 05620

11 February 2022

20-0789 extension of net metering registrations commissioning dates

Dear Ms. Anderson:

Washington Electric Co-op (WEC) writes in support of REV and AllEarth Renewable's motions to extend commissioning deadlines for net-metering and standard offer projects whose commissioning deadlines fall on or after January 1, 2022, through December 31, 2022.

WEC also wants to inform the Commission that COVID 19-related supply chain issues are multi-faceted and affect more than just the commissioning deadlines.

WEC is facing supply chain delays for distribution equipment including meters and transformers, beyond typical lead times. For example, the current lead time on transformers is being quoted as 40 weeks from order placement. The risk we face is the uncertainty that time period will actually occur; it could be longer and is out of our control. This issue for transformer deliveries is unprecedented for WEC.

While not every new net metering registration requires replacing the existing transformer with a new transformer with sufficient capacity to accommodate the member's proposed generation equipment (AC kw rating of inverter), WEC cannot determine this until the registration is filed with ePUC. The filing of a new registration is the first opportunity for WEC to assess whether a replacement transformer is required. If a transformer is needed, WEC may not know whether or when it would be available.

COVID-related supply chain issues make it difficult for WEC to timely object to a registration, for example on the basis of system stability, when WEC does not know if and when needed equipment would be available.

WEC proposes to inform the member, contractor and PUC for each new registration for which a new transformer is required, which is WEC's standard practice.

Under the current COVID-related supply chain condition WEC will also make best efforts to inform the member of the COVID-related supply delays and schedule the required upgrade of the member's transformer on a case-by-case basis.

Please let me know if there are questions.

Sincerely,

A handwritten signature in black ink that reads "Bu Powell". The signature is written in a cursive, slightly slanted style.

William Powell  
Director, Products and Services  
Filed via ePUC