



August 17th, 2023

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602

Re: Comments on Proposed Rule 5.100 (Case No. 19-0855-RULE)

Dear Clerk Anderson,

After reviewing proposed Rule 5.100 issued by the Commission on May 17th, Norwich Solar is seriously concerned that several of the changes in the proposed Rule will needlessly limit net metering opportunities and reduce the benefits that this program provides to the state and to Vermont residents and businesses.

Norwich Solar shares the concerns raised by Renewable Energy Vermont (REV) that the changes to the preferred siting definition – and especially the proposed “significant forest clearing” provision – arbitrarily limit the ability of local and regional governments to designate preferred sites and are not supported by ecological or climate science. While forests do sequester and store carbon and provide habitat for wildlife, both the climate and habitat value of forest varies widely from site to site. For example, a three-acre early successional parcel with many invasive species that is crossed by existing powerlines stores considerably less carbon and provides much lower habitat value to native species than an undisturbed, interior forest block of the same size. The public good for Vermonters is not served by prohibiting local governments from accounting for forest quality when determining whether or not to designate these types of sites as preferred sites.

Additionally, we share REV’s concern that the proposed changes to the compensation structure for systems that are expanded by more the 5% of 10 kW unfairly penalizes early solar adopter and will discourage the expansion of solar net-metering at sites where the deployment of solar has already been demonstrated to be in the public interest. As Vermonter’s move toward electric vehicles and heat pumps, their electricity consumption will grow significantly. A household that installed an (at the time) average-sized 7 kW system in 2020, would face a 4 cent/kWh loss on the output of that system if it expanded that system to 18 kW to accommodate this increased load. This would be cost-prohibitive for most system owners. Larger, off-site systems would be even more disadvantaged. A 250 kW system could only add 12.5 kW before triggering the change in rates on the existing system. Given the Commission’s further narrowing of the sites that are eligible for preferred site status, utilizing existing net-metering sites to their maximum potential should be a priority but these provisions do exactly the opposite.

Finally, the ability of net-metered systems to participate in wholesale markets as envisioned in FERC Order No. 2222 creates additional opportunities for net-metered systems to provide value to the system owner *and* to reduce overall systems costs for all Vermont utilities and their ratepayers. We echo REV in urging the Commission to be more specific about its concerns with




net-metering participation in wholesale markets and the process for gaining approval for doing so.

Overall, we believe that these changes will limit the ability of local planning bodies to support renewable generation in their jurisdictions, unfairly disadvantage early adopters of solar power, and stifle business innovations that would benefit Vermont ratepayers while providing little public benefit.

Our mission is to continue to advance the integration and deployment of affordable solar power for regional organizations – enabling them to improve their bottom line while reducing their carbon footprint. Our clients include municipalities, community services institutions, schools, businesses large and small, and community solar residential clients.

Sincerely,

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Jim Merriam
Norwich Solar
Chief Executive Officer