

Vermont Independent Power Producers

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As the end of this phase of the Standard Offer Program nears, VIPPA celebrates the Standard Offer Program as achieving a number of the goals established by the Vermont Legislature. The Standard Offer Program has supported the development of renewable energy and the energy industries in Vermont, particularly the solar industry which was in nascent stages in 2009. The Standard Offer Program has developed a viable market for renewable technologies with long-term stably priced contracts. Perhaps most importantly, the Standard Offer Program provides Vermonters with more than 111,000 MWH/year of non-fossil fuel renewable generation.

In 2009 the Vermont Legislature understood that fossil fuel generation was harmful to the environment. In 2009 the Legislature did not recognize Climate Change would become the existential threat we now know it to be. Nevertheless, Renewable Energy programs such as the Standard Offer Program have proven to be one of the best methods of combating Climate Change and also meeting increased electrical demand resulting from the electrification of the heating and transportation sectors of our economy. VIPPA strongly encourages Vermont to continue to aggressively combat Climate Change with well-designed and well-functioning renewable energy programs such as the Standard Offer Program.

1. VIPPA offers the following responses to several questions raised by the PUC in Case No. 21-4085-INV.
 - The PUC should continue to issue offers until the 127.5 MW capacity is reached. Because of expected attrition of pending Standard Offer projects, we anticipate that RFPs will be needed after 2022 to meet the required capacity of 127.5 MW. RFPs may be required for several years after 2022.
 - VIPPA does not see a risk in “over-building” the 127.5 MW Standard Offer capacity. As referenced above, Vermonters are now cognizant of the existential threat of Climate Change. Standard Offer projects above the 127.5 MW capacity are needed.
 - VIPPA also believes that Standard Offer Contracts should continue to be available to existing hydroelectric projects and Farm Methane projects. Existing hydroelectric projects and Farm Methane projects do not count against the 127.5 MW cumulative capacity requirement.

- VIPPA believes the Reserve Group mechanism specified in past RFPs should be maintained in order to limit to some degree attrition of pending projects. However, VIPPA does not believe a Reserve of much longer duration than 6 months will work as a mechanism to “fill-in” projects to meet the 127.5 cumulative capacity requirement.

We appreciate the opportunity to provide these comments.

VERMONT INDEPENDENT POWER PRODUCERS

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