

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 18-3810-INV

Investigation into Renewable Energy Standard
rulemaking

Order entered: 05/02/2019

ORDER REQUESTING COMMENT ON PROPOSED DRAFT RULE

I. INTRODUCTION

In today's Order, the Vermont Public Utility Commission ("Commission") requests comments on the Commission's draft proposed Renewable Energy Standard ("RES") Rule.

II. BACKGROUND

In November 2018, Commission staff opened an investigation to begin the process of drafting the RES Rule. Presently, the RES is authorized under statute and implemented by order.¹ However, in 2018, the Vermont General Assembly directed the Commission to adopt a rule to implement the RES and required that the Commission commence the formal rulemaking process (i.e., submittal to the Interagency Committee on Administrative Rules) by July 1, 2019.²

Commission staff convened two workshops about the rulemaking and requested that stakeholders provide comments about the RES processes and provisions, currently implemented by order, that may need changes or improvements.³ Workshop participants and commenters included: the Vermont Department of Public Service ("Department"), Green Mountain Power Corporation, Burlington Electric Department, Vermont Electric Cooperative, Washington Electric Co-op, Vermont Public Power Supply Authority, Renewable Energy Vermont, Sierra Club, Vermonters for a Clean Environment, Rights & Democracy, Vermont Interfaith Power and Light, the Vermont Fuel Dealers Association, the National Biodiesel Board, and William F. Scully.

As background, the RES requires Vermont electric utilities to acquire specified amounts of renewable energy in the form of renewable energy credits ("RECs") or environmental

¹ 30 V.S.A. chapter 89, in particular §§ 8002, 8004, 8005, and 8006; *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Orders of 3/15/16, 6/28/16, and 10/27/16.

² Public Act 139, § 14 (2018 Vt., Adj. Sess.) (amending Public Act 56, § 8 (2015 Vt., Bien. Sess.)).

³ Commission staff held workshops on December 10, 2018, and January 29, 2019.

attributes and to achieve fossil-fuel and greenhouse gas reductions by implementing energy transformation projects. An energy transformation project is:

an undertaking that provides energy-related goods or services but does not include or consist of the generation of electricity and that results in a net reduction in fossil fuel consumption by the customers of a retail electricity provider and in the emission of greenhouse gases attributable to that consumption. Examples of energy transformation projects may include home weatherization or other thermal energy efficiency measures; air source or geothermal heat pumps; high efficiency heating systems; increased use of biofuels; biomass heating systems; support for transportation demand management strategies; support for electric vehicles or related infrastructure; and infrastructure for the storage of renewable energy on the electric grid.⁴

The RES is divided into three categories, referred to as “Tiers.” Tier I requires the electric utilities to procure an amount of renewable energy equivalent to 55% of their annual retail electric sales for the year 2017, increasing by 4% every third January 1 thereafter, eventually reaching 75% in 2032.⁵ Tier II requires that a portion of the renewable energy that the utilities procure to satisfy Tier I be from distributed renewable generation resources. Under Tier II the utilities must procure an amount of renewable energy equivalent to 1% of their annual retail electric sales from distributed renewable generation resources in 2017, increasing by three-fifths of a percent each year thereafter, eventually reaching 10% in 2032.⁶ Tier III requires retail electricity providers to procure additional distributed renewable generation eligible for Tier II or to achieve fossil-fuel reductions from energy transformation projects equivalent to 2% of their annual retail electric sales in 2017, increasing by two-thirds of a percent each year thereafter, eventually reaching 12% in 2032.⁷

⁴ 30 V.S.A. § 8002(28).

⁵ 30 V.S.A. § 8005(a)(1)(B).

⁶ 30 V.S.A. § 8005(a)(2)(C).

⁷ In the case of a retail electricity provider that is a municipal electric utility serving not more than 6,000 customers, the required amount for Tier III is 2% of the provider’s annual retail sales beginning on January 1, 2019, increasing by an additional two-thirds of a percent each subsequent January 1 until reaching 10 and two-thirds percent on and after January 1, 2032. 30 V.S.A. § 8005(a)(3)(B).

To draft the proposed rule, the Commission started with the ordering paragraphs from the primary order implementing the RES⁸ (the “June 2016 Order”) and added the necessary language from the other implementing orders.⁹ Then, the Commission made additions and changes to ensure consistency with the implementing statutes and to provide clarity and internal consistency. Next, the Commission added purpose, background, authority, and definition sections and changed terms throughout the rule to align with the terms used in the statute and other defined terms added to the rule. Finally, the Commission made changes consistent with those stakeholder comments that the Commission decided to adopt as well as changes based on Commission staff’s experience using the rule. Stakeholder comments and proposals are addressed below in the order in which they apply to the draft rule.

III. DISCUSSION

Section 4.404, System for Tracking Compliance with Tiers I and II

The Commission received comments that additional efforts should be made to ensure appropriate tracking of environmental attributes associated with energy imports from external control areas (i.e., Hydro-Québec, “HQ,” and the New York Power Authority, “NYPA”), which the utilities may use to comply with Tier I of the RES.

The Commission proposes requiring that the NYPA attributes be tracked in NEPOOL GIS. When the June 2016 Order was issued, the NYPA attributes could not be tracked in GIS; however, that is no longer the case. Requiring tracking in GIS will protect against duplicative claims being made on those attributes and will help to streamline compliance review processes.

As for the HQ attributes, it is the Commission’s understanding that the HQ attributes cannot be monitored in GIS. Therefore, the Commission proposes removing the requirement in the June 2016 Order that the utility demonstrate its ownership of those attributes through retirement of the attributes as they are monitored in GIS, even if the utility claims a different value for the environmental attributes than that displayed in GIS. Additionally, it is the Commission’s understanding that if the utilities provide attestations from HQ indicating: (1) the percent of generation from renewable resources, (2) that the utility had ownership rights to the

⁸ *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Order of 6/28/16.

⁹ *Investigation re: establishment of the Renewable Energy Standard program*, Docket No. 8550, Orders of 3/15/16 and 10/27/16.

attributes, and (3) that the attributes had not been claimed elsewhere, that should be sufficient for demonstrating compliance with the RES and there should not be a risk of duplicative claims being made on the attributes because there are no other jurisdictions in which those attributes may be bought or sold.

Additionally, regarding attributes from HQ, the Commission seeks comments on whether, for purposes of RES compliance, HQ attributes must be purchased in a bundle with power or whether a utility may purchase the attributes separate from a power purchase.

Section 4.406, Qualification of Generation Facilities for Tiers I and II

The Department made comments regarding ways to improve the registration process for qualifying facilities for Tiers I and II of the RES. The Commission is proposing to incorporate the suggested procedural changes into the draft rule. Additionally, the Commission is proposing improvements to clarify and streamline the process for approving utilities' aggregated facilities for Tiers I and II of the RES and quarterly updates to those aggregations.

Section 4.409, Process for Prior Approval of Energy Transformation Measures

Stakeholders provided comments on improving the transparency of the Technical Advisory Group ("TAG") process for prior approval of energy transformation measures. The Commission proposes including a provision in the rule requiring TAG meetings related to energy transformation measures to be noticed and open to the public and for time to be included in meeting agendas for public input. The Commission believes that imposing any more prescriptive requirements on the TAG through this rule is not necessary, but strongly encourages the TAG and the Department to work together to post information online about the TAG process and TAG meetings, and to maintain an "interested persons" email list for purposes of providing notice of TAG meetings.

Section 4.410, Cost-Effectiveness Screening of Energy Transformation Projects

Several comments were made related to the cost-effectiveness screening portion of the RES requirements, including comments about the requirement that utilities evaluate alternative energy transformation projects that do not increase electric consumption and comments about

defining “administrative costs.” The Department has stated that it will work with stakeholders over the summer to discuss these issues and will provide a proposed definition of “administrative costs” by September 30, 2019.

Because stakeholders are actively working together on these issues, the Commission is not proposing any substantive changes to this section of the draft rule at this time. The Commission anticipates receiving comments and proposals regarding these issues during the formal public comment period after the rule is approved by the Interagency Committee on Administrative Rules. The Commission will ensure that the public comment period is held open until at least September 30, 2019.

Section 4.412, Evaluation, Measurement, and Verification of Energy Transformation Projects

The Department recommended that as part of the utilities’ Tier III annual plans (required under Section 4.417) and annual reports, the utilities use a standard table to summarize their energy transformation projects. The utilities all filed comments in support of using standardized planning and reporting templates. The Commission has included language in the rule requiring utilities to use a standard table for summarizing energy transformation projects in Tier III annual plans and reports. As proposed, the table itself will not be a part of the rule; however, the Commission requests that stakeholders provide comments on the summary table filed by the Department in its April 5, 2019, comments.

This section of the rule also includes the process for utilities to submit and stakeholders to comment on Tier III annual reports. The Commission is proposing a new provision whereby if the Department or any interested party recommends that the Commission reject any of a utility’s energy transformation project fossil-fuel savings claims, the utility may petition the Commission by July 1 to request a ruling on whether the savings comply with the RES statute and the rule.

Section 4.413, Equitable Opportunity to Participate in and Benefit from Energy Transformation Projects

Stakeholders requested that the Commission incorporate guidance or process within the rule to ensure equity of participation in and benefit from Tier III energy transformation projects

for all Vermonters. The Commission previously considered the equity issue during the Docket 8550 proceeding and included provisions regarding equity in the June 2016 Order, which are now incorporated into the draft rule. If a utility is offering energy transformation projects, it must: (1) offer the projects to both low-income and non-low-income customers as well as to both residential and commercial/industrial customers, (2) provide adequate information to customers about energy transformation project offerings, and (3) track customer participation, so that the utility can iteratively refine programs, as needed to ensure equity. If stakeholders have more specific ideas for addressing equity, the Commission would welcome those comments.

Section 4.416, Specific Types of Energy Transformation Projects

During the review of utilities' 2017 Tier III annual reports, questions were raised about whether certain weatherization projects qualify under the RES. The Commission has proposed language to help identify low-income weatherization projects that qualify for the RES. The Commission requests that stakeholders provide comment on the average cost to create one MWh of energy savings with low-income weatherization.

Section 4.417, Tier III Annual Planning

A. Approval of Tier III Annual Plans

The Department recommended that the Commission approve the utilities' Tier III annual plans, which must be submitted each year by November 1. The utilities expressed concerns about the Department's proposal. During the 8550 proceeding, the Commission previously concluded that, "Tier III annual plans submitted by [utilities] should be subject to [Commission] review and stakeholder comment but need not be explicitly approved by the [Commission]."¹⁰ Rather than requiring approval of the utilities' Tier III annual plans, the Commission proposes adding the following provisions: requiring stakeholders to submit comments on Tier III annual plans by December 1; stating that the Commission may schedule workshops on Tier III annual plans; directing the Commission to notify a utility if it finds that a Tier III annual plan does not include the information required by the rule; and stating that the Commission may issue an order

¹⁰ June 2016 Order at 55-56.

either directing the utility to file an amended plan or opening an investigation, if the Commission finds that the plan does not include the information required by the rule.

B. Custom Energy Transformation Projects

Stakeholders requested that Tier III annual plans include more specific information about custom energy transformation projects to allow for more meaningful stakeholder involvement. The June 2016 Order and proposed draft of the rule require the annual plans to include “a description of the types of energy transformation projects that will be undertaken, including the types of measures to be implemented and the anticipated number of participants, with sufficient information for the Department to develop an evaluation, measurement, and verification plan and budget.”¹¹ The Commission is not proposing any changes from the June 2016 Order at this time in regard to this issue, but welcomes detailed suggestions from stakeholders concerning what specific information they recommend the rule require when a utility proposes a custom energy transformation project.

Additionally, the Commission received a comment suggesting that the Commission require utilities to use an open, competitive solicitation process to select the custom energy transformation projects they will implement. While utilities may certainly use such a process (which at least one utility has already done), the Commission does not think it is necessary to mandate such a requirement through the rule.

C. Load Growth

In relation to the annual plan section of the rule, the Department has stated that it plans to work with stakeholders this summer to determine what specifically should be included in Tier III annual plans regarding load growth to ensure load growth does not result in unnecessary transmission and distribution upgrades. Because stakeholders are actively working together on this issue, the Commission is not proposing any substantive changes regarding this issue at this time. The Commission anticipates receiving comments and proposals about this issue during the formal public comment period after the initial proposed rule is approved by the Interagency Committee on Administrative Rules.

¹¹ June 2016 Order, Section VII (13)(b)(i) at 78.

D. Nuclear Power, Non-renewables, and Energy Transformation Projects

The Commission received comments raising concerns about allowing utilities to count the nuclear portion of their power portfolios when determining the fossil-fuel savings from their energy transformation projects. Tiers I and II of the RES establish renewable energy requirements, whereas Tier III establishes energy transformation project requirements to reduce fossil-fuel use and greenhouse gas emissions. While the statute explicitly states that nuclear energy is not renewable energy, the Tier III requirements do not require that fossil-fuel savings from energy transformation project electrification measures be from renewable energy. An energy transformation project powered by electricity generated in part by nuclear power will reduce fossil-fuel use and the emission of greenhouse gases. Therefore, the Commission is not proposing to include anything in the draft rule on this issue.

Several commenters also requested that the rule prohibit energy transformation projects that use fossil fuels or non-renewable fuels. Because other stakeholders have not yet had the opportunity to provide comments on this issue, the Commission is not proposing anything in the draft rule on this topic at this time; however, the Commission welcomes stakeholders to provide comment on this issue, including the statutory basis.

Additionally, regarding nuclear, the Commission seeks comments on whether a utility may use nuclear attributes purchased separately from nuclear power to increase the carbon-free portion of its power portfolio; whether the RES statute prohibits that; and if the RES statute does not prohibit it, whether the rule should.

Section 4.419, Filing Schedule and Requirements

The Department recommended that the utilities use a standard compliance spreadsheet when submitting their annual compliance filings each August 31 demonstrating compliance with all three Tiers of the RES. The utilities have commented that they support using a standard compliance spreadsheet. The Commission has included language requiring utilities to use a standard compliance spreadsheet when submitting their annual compliance filings. As proposed, the spreadsheet itself will not be a part of the rule; however, the Commission requests that stakeholders provide comments on the spreadsheet filed by the Department with its April 5,

2019, comments. The Commission's goal is to adopt the compliance spreadsheet prior to August 31, 2019, so that the utilities can use it when submitting their 2018 compliance filings.

IV. REQUEST FOR COMMENTS

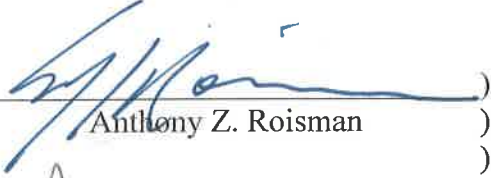
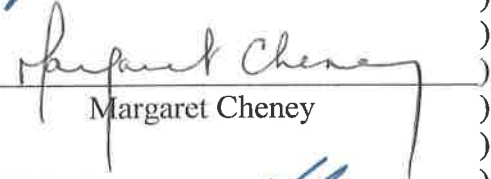

The Commission requests that stakeholders provide comments by May 24, 2019, addressing the attached draft proposed Renewable Energy Standard Rule and the issues discussed in today's Order. Additionally, stakeholders are invited to bring to the Commission's attention any other issues with the rule that should be addressed through the rulemaking process.

This rulemaking is being processed in the Commission's online document management system, known as ePUC, which can be accessed at <https://epuc.vermont.gov>. Documents related to this rulemaking are available in Case No. 18-3810-INV.

Comments should be filed in ePUC using the "Add Briefs, Comments, or Discovery" action. Comments should not be filed using the "Public Comment" option. This proceeding is not a contested case. Anyone interested in participating should contact the Clerk of the Commission at puc.clerk@vermont.gov to be added to the service list for this proceeding.

SO ORDERED.

Dated at Montpelier, Vermont, this 2nd day of May, 2019.

)	
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)	
)	
Margaret Cheney)	COMMISSION
)	
)	
Sarah Hofmann)	OF VERMONT

OFFICE OF THE CLERK

Filed: May 2, 2019

Attest: 
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

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