

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 19-3414-PET

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Petition of Star Wind Turbines, LLC for clarification of interconnection applications for standard offer projects	
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Order entered: 10/03/2019

**ORDER CLOSING CASE**

On September 3, 2019, Star Wind Turbines (“Star Wind”) petitioned the Vermont Public Utility Commission (“Commission”) to “sanction the use of” the Commission’s Rule 5.500 standard interconnection application form for a small renewable generation facility that is participating in the standard-offer program. Star Wind represents that it has received conflicting instructions from Green Mountain Power Corporation (“GMP”) and Vermont Electric Cooperative, Inc. (“VEC”) about the correct form to use to apply for interconnection. Star Wind states that GMP requested that Star Wind submit a “small renewables” application form, which is similar to the application form that net-metering customers use to apply for a certificate of public good (“CPG”). In contrast, Star Wind states that VEC has accepted the standard interconnection application form pursuant to Rule 5.500 for similar facilities.

The Commission construed the petition as a request for dispute resolution pursuant to Commission Rule 5.508(D).<sup>1</sup> Notice of the petition was provided to the Vermont distribution utilities and the Department of Public Service. Comments on the petition were due September 17, 2019.

On September 17, 2019, the Department and GMP filed comments. GMP states that “the same application form, rules, and procedures that the Commission applies to net metering systems” apply to small renewable generators.<sup>2</sup> According to GMP, Rule 5.501 states that Rule 5.100 (the net-metering rule) governs the interconnection of net-metering systems and, therefore, Rule 5.100 also governs the interconnection of small renewable generators. Nonetheless, GMP

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<sup>1</sup> This rule provides that “If a dispute arises at any time during these [interconnection] procedures, either the Interconnection Requester or the Interconnecting Utility may seek immediate resolution by written petition to the Commission, with copies to the other party and the Vermont Department of Public Service, stating the issues in dispute.”

<sup>2</sup> GMP Comments at 1 (citing 30 V.S.A. § 8007(a)).

“agrees with Star Wind that the 5.500 application also would provide GMP with relevant information for [the] interconnection” and “GMP has no objection to the Commission granting Star Wind’s request to use the 5.500 application for the Standard Offer contracts referenced in Star Wind’s petition in this case.”<sup>3</sup>

The Department recommends that the Rule 5.500 interconnection application form is the correct interconnection application for small renewable generators because “Rule 5.500 was specifically created to address interconnection procedures, and Rule 5.100 defers to Rule 5.500 to do as such.”<sup>4</sup>

Section 8007(a) of Title 30 specifies that the application form, rules, and procedures for net-metering systems “*shall apply to the review under section 248 of this title of any renewable energy plant with a plant capacity of 150 kW or less.*”<sup>5</sup> This statutory provision governs applications for a CPG, not interconnection applications. Interconnection procedures are governed by Rule 5.500. The Commission has held that a Rule 5.100 CPG registration or application constitutes an interconnection application that is governed by the procedures set forth in Rule 5.500.<sup>6</sup> However, there is no reason that a small renewable generator cannot elect to apply for interconnection using the Rule 5.500 standard application form before it applies for a CPG.

Based on GMP’s statement that it would accept a Rule 5.500 interconnection application form for Star Wind’s projects, the Commission concludes there is no dispute about how to proceed with the interconnection of Star Wind’s projects. GMP may accept a Rule 5.500 interconnection application for Star Wind’s projects. This case is closed.<sup>7</sup>

**SO ORDERED.**

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<sup>3</sup> GMP Comments at 2.

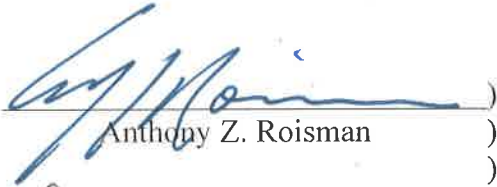
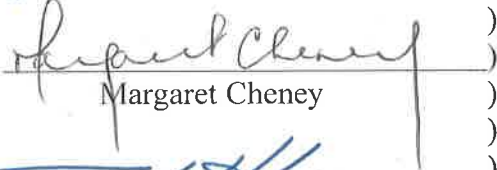

<sup>4</sup> Department Comments at 2.

<sup>5</sup> 30 V.S.A. §8007(a) (emphasis added).

<sup>6</sup> *Application of JPS Solar LLC*, Case No. 18-2231-NMR order of 10/4/2018.

<sup>7</sup> The motion of Alexander Wing, Esq. to withdraw as counsel for the Department of Public Service is granted.

Dated at Montpelier, Vermont, this 3rd day of October, 2019

	)	
Anthony Z. Roisman	)	PUBLIC UTILITY
	)	
	)	
Margaret Cheney	)	COMMISSION
	)	
	)	
Sarah Hofmann	)	OF VERMONT

OFFICE OF THE CLERK

Filed: October 3, 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](mailto:puc.clerk@vermont.gov))*

*Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.*

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