

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-2935-INV

Investigation to review the 2021 implementation of the standard-offer program	
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COMMENTS OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE ON THE RECOMMENDATIONS OF THE STANDARD OFFER FACILITATOR FOR THE 2021 STANDARD OFFER PROGRAM

On August 6, 2021, the Standard Offer Facilitator (“Facilitator”) provided the Vermont Public Utility Commission (“Commission” or “PUC”) its recommendations for which of the project bids, submitted in response to the request for proposals (“RFP”), should receive Standard Offer contracts for the 2021 program year. The Commission requested comments on the Facilitator’s recommendations by September 10, 2021, along with specific comments as to whether a proceeding should be opened to review if the proposed 1.7 MW low-flow unit at the Harriman Reservoir is eligible to receive a standard-offer contract as a “new hydroelectric” system under 30 V.S.A. § 8005a.

The Vermont Department of Public Service (“Department”) has reviewed the comments and recommendations submitted by the Facilitator, on August 6, 2021, and has not identified any concerns. The Department has also informally conferred with the proponent of the 1.7 MW low-flow hydroelectric generation unit at the Harriman Reservoir and does not recommend a separate proceeding to review that Project’s eligibility for a Standard Offer contract. The Department’s inquiry largely focused on whether that proposed system is a “single plant,” as provided by 30

V.S.A. § 8002(18), that is distinct from a preexisting and nearby hydroelectric facility. Preliminary evidence provided during the Department's discussions with the proponent of the 1.7 MW low-flow hydroelectric generation unit at the Harriman Reservoir suggests that the two facilities are likely separate facilities under the statute. This preliminary evidence indicates that the proposed project will have separate equipment and infrastructure for interconnection and electricity generation and that the facilities are not proximate or contiguous in construction timelines. To the extent that the Commission may desire to make findings and conduct further inquiries under 30 V.S.A. § 8002(18), these could be addressed during the review of the 30 V.S.A. § 248 application Standard Offer milestone and would not require a separate proceeding.

Thank you for the opportunity to comment, please reach out to me with any questions or concerns.

Dated at Montpelier, Vermont this 10th day of September 2021.

VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Alex Wing
Alexander Wing, Special Counsel
Department of Public Service
112 State Street
Montpelier, VT 05620-2601
alexander.wing@vermont.gov
(802) 828-4011

cc: ePUC Service List