

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 21-4085-INV

---

Investigation to review the 2022 implementation of the standard-offer program	
--	--

---

Order entered: 06/28/2022

**ORDER RE: 2022 STANDARD OFFER AWARD GROUP**

**I. INTRODUCTION**

In today's Order, the Vermont Public Utility Commission ("Commission") announces the Award Group and Reserve Group under the 2022 standard-offer program request for proposals ("RFP").

**II. PROCEDURAL HISTORY**

On October 4, 2021, the Commission opened this investigation to conduct a review of the 2022 implementation of the standard-offer program.

On February 15, 2022, the Commission adopted price caps for the 2022 standard-offer program and directed the Standard Offer Facilitator ("Facilitator") to issue the RFP.

On March 14, 2022, the RFP was issued. The deadline for proposal submissions was May 2, 2022.

On May 3, 2022, the proposals were opened.

On May 17, 2022, the Facilitator filed a list of projects recommended to receive standard-offer contracts. The Commission requested that participants file any comments on the Facilitator's recommendations by no later than June 10, 2022.

On June 10, 2022, Green Mountain Power Corporation and the Department of Public Service ("Department") filed comments supporting the Facilitator's recommendations.

**III. STANDARD OFFER FACILITATOR'S RECOMMENDATION**

The standard-offer program allocates capacity from proposals submitted by utility providers (the "Provider Block") and independent developers (the "Developer Block"). No proposals were received in the Provider Block. With respect to the Developer Block, capacity is allocated for specific renewable technologies ("Technology Diversity Developer Block") and for

price competitive proposals (the “Price Competitive Developer Block”). Thirteen proposals were submitted in the Price Competitive Developer Block, all for solar facilities. Nine proposals were submitted in the Technology Diversity Developer Block, consisting of small and large wind facilities, a biomass facility, and a new hydroelectric facility. The Facilitator recommended that ten projects be awarded contracts and that eight projects be placed in the Reserve Group, as shown in Table 1, below.

**Table 1.**

<b>Award &amp; Reserve Group Recommendations Summary</b>					
<b>AWARD GROUP</b>					
<b>Technology Diversity Developer Block</b>					
<b>Project Name</b>	<b>Technology</b>	<b>Price</b>	<b>MW</b>	<b>Total</b>	
1. Walnut Lane Wind	Small Wind	0.2540	0.022		
2. Alburgh Wind A	Small Wind	0.2540	0.050		
3. Alburgh Wind B	Small Wind	0.2540	0.050		
4. Alburgh Wind C	Small Wind	0.2540	0.050		
5. West Wind A	Small Wind	0.2540	0.075		
6. West Wind B	Small Wind	0.2540	0.075		
7. Stamford Main 4597	Large Wind	0.1150	2.200		
8. Bellows Falls Minimum Flow	New Hydro	0.1300	0.650	<b>3.172</b>	
<b>Price Competitive Developer Block</b>					
<b>Project Name</b>	<b>Technology</b>	<b>Price</b>	<b>MW</b>	<b>Total</b>	
1. Steinberg Road Solar	Solar	0.0818	2.20		
2. Midway Ave. Solar	Solar	0.0819	2.20	<b>4.400</b>	
<b>Total</b>				<b>7.572</b>	
<b>RESERVE GROUP</b>					
<b>Project Name</b>	<b>Technology</b>	<b>Price</b>	<b>MW</b>	<b>Total</b>	
1. Barre School Solar	Solar	0.0838	2.10		
2. Berlin Dog River Solar	Solar	0.0839	2.20		
3. Green Roots Solar Farm	Solar	0.0847	2.20		
4. South Hero Solar	Solar	0.0847	2.20		
5. I Love Cows Solar	Solar	0.0848	2.20		
6. St. Johnsbury Mayhew Solar	Solar	0.0849	2.20		
7. Vernon Station Solar Field	Solar	0.0860	2.20		
8. Hunt Road Solar	Solar	0.0867	2.20	<b>17.50</b>	

#### **IV. DISCUSSION AND CONCLUSION**

As discussed below, we adopt the recommendations made by the Facilitator for the Award Group and the Reserve Group.

FS Energy submitted a bid for a 2 MW biomass facility. The Facilitator recommended the disqualification of the proposal because FS Energy did not provide the required proposal security. Section 3.1.2 of the RFP states that “Proposals must include . . . [a] proposal security check for \$10/kW, payable to ‘VEPP Inc. – In Trust’.” FS Energy did not make any filings in response to the Facilitator’s recommendation. We agree with the Facilitator’s recommendation to exclude the proposal from the award group because FS Energy did not provide the required proposal security.

Thirteen bids were received in the Price Competitive Developer Block. The Facilitator recommended awarding contracts to two proposals and placing eight proposals in the Reserve Group. The Facilitator recommended excluding three proposals from the Reserve Group because the price for these proposals exceeded the maximum price set by the Commission. Section 3.1.6 of the RFP states that the proposed price of plants may not be greater than the specific price caps stated in the RFP. The price cap stated in the RFP for solar plants was \$0.0982/kWh. The proposed price for each of the NEER DG plants was \$0.1195/kWh. NEER DG did not respond to the Facilitator’s recommendation. We agree with the Facilitator’s recommendation to exclude these proposals from the Reserve Group because the proposed prices exceed the maximum price allowed for solar plants participating in the RFP.

In summary, we accept the Facilitator’s recommendations for the Award Group and Reserve Group. The Facilitator is directed to enter into standard-offer contracts with the award group identified in Table 1, above. The Reserve Group will consist of the eight plants identified in Table 1 as well.

We note that the information provided for the small wind facilities suggests that these proposals may raise single-plant issues that could affect these facilities’ qualification for standard-offer contracts.<sup>1</sup> Consistent with our precedent, single-plant issues will be investigated

---

<sup>1</sup> For example, the 75 kW West Wind A and 75 kW West Wind B facilities would exceed the 100 kW limit for small wind plants if these facilities are found to be part of the same plant. The proponent has certified that the facilities are separate plants for purposes of 30 V.S.A. § 8002(18). However, the information provided with the proposal shows the facilities in close proximity and potentially sharing common infrastructure.

when the facilities apply for a certificate of public good (“CPG”).<sup>2</sup> The proponents are encouraged to include in their CPG applications all information necessary to demonstrate that each proposed facility is a separate plant. Failure to include sufficient information for the Commission to determine that the facilities are separate plants could delay the Commission’s review of the CPG applications.

#### V. **ORDER**


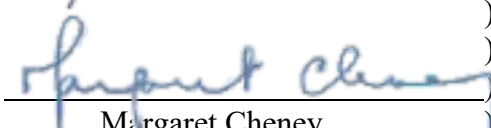
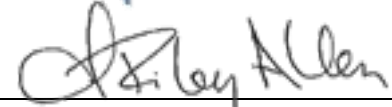
IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Vermont Public Utility Commission (“Commission”) that:

1. The Standard Offer Facilitator is directed to award standard-offer contracts to the projects included in the Award Group consistent with Table 1.
2. The Standard Offer Facilitator is directed to place eight plants in the Reserve Group, consistent with Table 1.

---


<sup>2</sup> *Investigation to review the 2021 implementation of the standard-offer program*, Case No. 20-2935-INV, Order of 9/28/2021 at 5.

Dated at Montpelier, Vermont, this 28th day of June, 2022.

 _____ )	) PUBLIC UTILITY ) ) COMMISSION ) OF VERMONT
Anthony Z. Roisman )	
_____ )	
 _____ )	) COMMISSION ) OF VERMONT
Margaret Cheney )	
_____ )	
 _____ )	) OF VERMONT
J. Riley Allen )	
_____ )	

OFFICE OF THE CLERK

Filed: June 28, 2022

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)*

*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.*

PUC Case No. 21-4085-INV - SERVICE LIST

Carolyn M.X. Alderman, Esq. (for VEPP Inc.)  
VEPP Inc.  
P.O. Box 1938  
Manchester Center, VT 05255  
carolyn@veppi.org

Carolyn Browne Anderson, Esq. (for Green Mountain  
Green Mountain Power Corporation Power Corporation)  
2152 Post Road  
Rutland, VT 05702  
carolyn.anderson@greenmountainpower.com

Reginald Beliveau, Jr. (for Swanton Village,  
Swanton Village, Inc. Electric Department Inc. Electric Department)  
P.O. Box 279  
120 First Street  
Swanton, VT 05488  
rbeliveau@swanton.net

Victoria J. Brown, Esq. (for Vermont Electric  
Vermont Electric Cooperative, Inc. Cooperative Inc.)  
42 Wescom Road  
Johnson, VT 05656  
vbrown@vermontelectric.coop

Ellen Burt (for Town of Stowe  
Town of Stowe Electric Department Electric Department)  
P.O.Box 190  
Stowe, VT 05672  
eburt@stoweelectric.com

Crystal L Currier (for Barton Village Inc.  
Vermont Public Power Supply Authority Electric Department)  
PO Box 126  
Waterbury Center, VT 05677  
ccurrier@vppsa.com

Alex DePillis (for Vermont Agency of  
Agency of Agriculture Food & Markets Agriculture, Food and  
116 State Street Markets)  
Drawer 20  
Montpelier, VT 05620-2901  
Alex.DePillis@vermont.gov

Evan B. Dell'Olio  
Roberts Energy Renewables, Inc.  
1541 Spruce Corner Road  
Ashfield, MA 01330  
evan@rer-energy.com

(for Roberts Energy  
Renewables, Inc.)

William F. Ellis  
McNeil, Leddy & Sheahan  
271 South Union Street  
Burlington, VT 05401  
wellis@mcneilvt.com

(for City of Burlington  
Electric Department)

Jonathan Elwell  
Village of Lyndonville Electric Department  
PO Box 167  
20 Park Avenue  
Lyndonville, VT 05851  
jelwell@lyndonvilleelectric.com

(for Village of Enosburg  
Falls Water & Light  
Department Inc.)

Jonathan Elwell  
Village of Lyndonville Electric Department  
PO Box 167  
20 Park Avenue  
Lyndonville, VT 05851  
jelwell@lyndonvilleelectric.com

(for Village of  
Lyndonville Electric  
Department)

Elijah D Emerson, Esq.  
Primmer Piper Eggleston & Cramer PC  
PO Box 1309  
Montpelier, VT 05601  
eemerson@primmer.com

(for Town of Hardwick  
Electric Department)  
(for Village of Johnson  
Water & Light  
Department) (for Village  
of Enosburg Falls Water  
& Light Department  
Inc.) (for Town of  
Northfield Electric  
Department)  
(for Village of Johnson  
Water & Light  
Department)

Marla Emery  
Village of Johnson Water & Light Department  
P.O. Box 603  
Johnson, VT 05656  
memery@townofjohnson.com

Steven R Farman  
Vermont Public Power Supply Authority  
5195 Waterbury-Stowe rd  
Waterbury Center, VT 05766  
sfarman@vppsa.com

(for Vermont Public  
Power Supply Authority)

Chad Farrell  
110 Main Street, Suite 2 E  
Burlington, VT 05401  
chad@encorerenewableenergy.com

(for Encore Renewable  
Energy)

Karen Field  
Town of Hardwick Electric Department  
PO Box 516  
Hardwick, VT 05843  
kfield@hardwickelectric.com

(for Town of Hardwick  
Electric Department)

Thomas T Garden  
Triland Partners LP  
44 Indian Rock Road  
P.O. Box 777  
Windham, NH 03087  
tgarden@trilandpartners.com

(for Triland Partners LP)

James Gibbons  
City of Burlington Electric Department  
585 Pine Street  
Burlington, VT 05401  
jgibbons@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Grace Grundhauser  
Green Mountain Power Corporation  
163 Acorn Lane  
Colchester, VT 05446  
grace.grundhauser@greenmountainpower.com

(for Green Mountain  
Power Corporation)

Michael J. Hall  
Stackpole & French Law Offices  
PO Box 819  
Stowe, VT 05672  
mhall@stackpolefrench.com

(for Town of Stowe  
Electric Department)



Penny Jones  
Village of Morrisville Water & Light Department  
857 Elmore Street  
Morrisville, VT 05661  
pjones@mwlvt.com

(for Village of  
Morrisville Water &  
Light Department)

Michael Lazorchak  
Town of Stowe Electric Department  
435 Moscow Rd  
Stowe, VT 05672  
mlazorchak@stoweelectric.com

(for Town of Stowe  
Electric Department)

Mari McClure  
Green Mountain Power Corporation  
163 Acorn Lane  
Colchester, VT 05446  
ceo@greenmountainpower.com

(for Green Mountain  
Power Corporation)

Pamela Moore  
Village of Jacksonville Electric Company  
P.O. Box 169  
Jacksonville, VT 05342  
sfarman@live.com

(for Village of  
Jacksonville Electric  
Company)

John Morley  
Village of Orleans Electric Department  
Municipal Building  
One Memorial Square  
Orleans, VT 05860  
jmorley@villageoforleansvt.org

(for Village of Orleans  
Electric Department)

David Mullett  
allEarth Renewables  
94 Harvest Lane  
Williston, VT 05495  
dmullett@allearthrenewables.com

(for All Earth  
Renewables, Inc.)

Ken Nolan  
Vermont Public Power Supply Authority  
P.O. Box 126  
Waterbury Center, VT 05677  
knolan@vppsa.com

(for Vermont Public  
Power Supply Authority)

Thomas Petraska  
Village of Ludlow Electric Light Department  
9 Pond Street  
Ludlow, VT 05149  
tpetraska@tds.net

(for Village of Ludlow  
Electric Light  
Department)

Louis Porter  
Washington Electric Cooperative  
PO Box 8  
East Montpelier, VT 05651  
louis.porter@wec.coop

(for Washington Electric  
Cooperative Inc.)

Cameron Reaves  
Encore Renewable Energy  
110 Main Street  
Suite 2C  
Burlington, VT 05401  
cameron@encorerenewableenergy.com

(for Encore Renewable  
Energy)

Carol Robertson  
Village of Hyde Park Electric Department  
P.O. Box 400  
Hyde Park, VT 05655  
carol.robertson@hydeparkvt.com

(for Village of Hyde  
Park Electric  
Department)

Matthew Rubin  
VT Independent Power Producers  
26 State Street  
Montpelier, VT 05602  
m@mrubin.biz

(for Vermont  
Independent Power  
Producers Association)

Jeffrey Schulz  
Town of Northfield Electric Department  
51 South Main Street  
Northfield, VT 05663  
jschulz@northfield.vt.us

(for Town of Northfield  
Electric Department)

Ronald A. Shems, Esq.  
Tarrant, Gillies & Shems, LLP  
P.O. Box 1440  
Montpelier, VT 05601-1440  
ron@tarrantgillies.com

(for Washington Electric  
Cooperative Inc.)

Annette Smith  
Vermonters for a Clean Environment, Inc.  
789 Baker Road  
Danby, VT 05739  
vce@vermontel.net

(for Vermonters for a  
Clean Environment)

Darren Springer  
City of Burlington Electric Department  
585 Pine Street  
Burlington, VT 05401  
dspringer@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Emily Stebbins-Wheelock  
City of Burlington Electric Department  
585 Pine Street  
Burlington, VT 05401  
estebbins-wheelock@burlingtonelectric.com

(for City of Burlington  
Electric Department)

Jesse Stowell  
Encore Renewable Energy  
110 Main Street  
Suite 2E  
Burlington, VT 05401  
jesse@encorerenewableenergy.com

(for Encore Renewable  
Energy)

Michael Sullivan  
Town of Hardwick Electric Department  
P.O. Box 516  
Hardwick, VT 05843  
msullivan@hardwickelectric.com

(for Town of Hardwick  
Electric Department)

Rebecca Towne  
Vermont Electric Cooperative, Inc.  
42 Wescom Road  
Johnson, VT 05656  
rtowne@vermontelectric.coop

(for Vermont Electric  
Cooperative Inc.)

Alexander Wing  
Vermont Department of Public Service  
112 State Street  
Montpelier, VT 05620  
alexander.wing@vermont.gov

(for Vermont  
Department of Public  
Service)

Meghan von Ballmoos  
VEPP, Inc.  
PO Box 1938  
Manchester Center, VT 05255  
meghan@veppi.org

(for VEPP Inc.)