

Summary of Responses, Updated September 19, 2023.

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Requested Action: Review the current updates / analysis of renewables from the VT Public Service Department and its Stakeholder Advisory Group, located at the links below. If you notice omissions in these scenarios, or have concerns about how the scenarios are defined, please e-mail them to the Co-Chairs of the RESRWG by **Noon on Wednesday, September 13.**

Stakeholders Advisory Group Scenarios, defined (link below, especially slides 5-8):

https://publicservice.vermont.gov/sites/dps/files/documents/VT%20RES-CES%20Technical%20Analysis%20Stakeholder%20Advisory%20Group%20Meeting_2_08.01.23_FINAL-SAG.pdf

From Louis Porter, General Manager, Washing Electric Cooperative:

In general, we believe that the DPS scenarios provide good bookends for this discussion and that they can be useful starting points to provide context for policy decisions. There are two important considerations which I think could be more robustly explored for the purposes of this discussion. I do believe that our working group can help fill in these gaps.

1. The first is in consideration of the rate impact/total bill impact of net metering. In particular, it would be useful to know more about these impacts as we consider the cost of net metering as a source of electricity, the lack of equity in distribution of net metering in our territories, and the potential (or already realized) negative impact on the adoption of beneficial electrification such as EVs and heat pumps due to the increased rate pressure from net metering.
2. The second is that we believe there could be greater consideration and data on the impact on system reliability from net metering, especially in territories like the one WEC serves that have high levels of net metering penetration. That impact on reliability of the system from net metering may be occurring in two ways. First, directly, by contributing to load/generation imbalances due to high levels of distributed generation (including net metering). The second is through decreased investment in the commonly owned infrastructure of utilities, particularly public power utilities. In other words, a large share of needed investment in utility infrastructure comes ultimately in the form of charges for electricity (as opposed to customer/member service charges) paid for by members. When net metering members (for perfectly valid, legally supported, and appropriate reasons) choose to net meter, they are reducing their contribution to that pool of funding necessary to support infrastructure investment. This is of particular concern in places where the existence already of 100% renewable portfolios mean that net metering power is replacing power which is already renewable and low or no carbon.

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From Darren Springer, General Manager, Burlington Electric Department:

- BED believes there should be additional economic analysis/metrics on the impact of any decisions to limit certain resource types, including biomass, in some of the DPS scenarios, and that all analysis should consider the need for additional transmission/distribution infrastructure associated with access to any resources and the cost of such infrastructure; and
- We believe the purpose of RES should be to cost-effectively and reliably provide renewable electricity supply for Vermont customers, lowering Vermont’s GHG emissions, and enabling the benefits of electrifying other sectors with renewable energy.

From Peter Sterling, Executive Director, Renewable Energy Vermont

REV did propose a scenario for evaluation that included high levels of energy storage and flexible load management, two attributes that maximize the economic benefits of wind and solar. This was not included in DPS’ list of scenarios.

However, the biggest concern we have isn’t with DPS’ list of scenarios, it’s that the one size fits all nature of their analysis isn’t likely to get us to a consensus on legislation given the great variation in the size of Vermont’s utilities and their power portfolios. For example, GMP already buys a lot of in-state power, WEC and Swanton are much smaller and are currently exempt from in-state purchasing requirements. We find a much finer analysis than what DPS’ scenarios are able to provide.

Finally, there are real concerns with the data and assumptions DPS is making in their modeling. For example, when DPS runs their scenarios, they are probably going to assume no changes to net metering which will unnecessarily inflate the cost of in state renewables and therefore make the status quo seem more attractive. REV has repeatedly stated we are open to discussing ways to make net metering more cost effective would hope to have the Working Group discuss this option before any modeling is done. I think it is pretty safe to say the utilities would very much agree with this as well.

We want to get things off on the right foot seeing this as a chance for a balanced, new conversation about new renewables and were surprised and disappointed when the Working Group started constrained by the work of DPS, which generally favor the status quo. From here, we hope things can move forward with the focus on new renewables and not get distracted by nuclear power and the policies of the past.