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VIA HAND DELIVERY
October 14, 2016

Judith Whitney, Clerk
VERMONT PUBLIC SERVICE BOARD
Peoples United Bank Building, 4th Floor
112 State Street
Montpelier, VT 05620-2701

Re: Revised net metering program pursuant to Act 99 of 2014; Compliance tariff

Dear Ms. Whitney:

By this filing, Green Mountain Power (“GMP”) respectfully requests that the Public Service Board (“Board”) approve the enclosed net metering tariff sheets in compliance with the Board’s Order of August 29, 2016. This filing consists of an original and nine copies (clean and marked) of tariff sheets and implements the changes to Rule 5.100 outlined in that Order.

Delayed Implementation

GMP also respectfully requests that the Board allow GMP additional time to implement the non-bypassable charge provision of the tariff until bills rendered on and after July 1, 2017. The ability to request delayed implementation of this provision is provided in Section 5.133 of the Board rule.

The Company’s billing, accounting and reporting systems will require significant modification to accommodate this provision and the format of the bill by GMP’s outside service provider will also need to reflect these billing changes. Much of the work on the bill format will need to wait until the billing system work has been completed. GMP has also built testing and quality control features into the scope of time estimated to complete this project.

As such, new customers who begin net metering in 2017 will continue to be able to offset all of their line items on the bill using net metering credits until GMP is able to complete the programming necessary to implement non-bypassable charges. A specific sentence allowing for a delayed implementation of the non-bypassable charge provision has been included on

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Sheets 23-3 and 23-6 of the tariff that puts forth the terms and conditions of net metering in 2017 and beyond.

500 kW Customer Limit

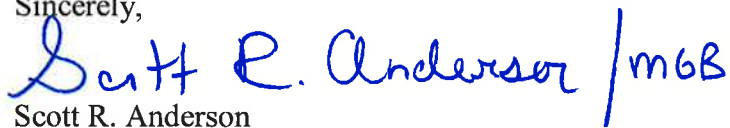
GMP staff have been contemplating the 500 kW customer limit outlined in Section 5.128(D) of the Board rule and have concluded that it will be a very complex and difficult effort to programmatically police this provision. Customers have accounts under many names and variations and it will be very difficult for GMP to ascertain whether and when a specific customer exceeds the 500 kW limit. While the tariff does include language that prohibits a customer from exceeding this limit, GMP requests that the Board put the burden on the customer to comply with this rule by including a statement in the application and registration process whereby a customer would need to affirm that the application for net metering does not put the customer over the 500 kW limit. We believe that checking for this limit at the beginning of the application process will be the best method to prevent systems from being built when they should not be built because of this rule.

Conclusion

In summary, GMP requests the approval of the enclosed tariff sheets effective with service rendered January 1, 2017.

Please feel free to contact me if you have any questions.

Sincerely,

 /m6B

Scott R. Anderson

Enclosures

CC: Timothy Duggan, Esq., Vermont Department of Public Service