



August 22nd, 2023

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602

Re: PUC Proposed Rule 5.500 Revisions (Case No. 19-0856-RULE)

Dear Clerk Anderson,

Renewable Energy Vermont (REV) is grateful for the opportunity to provide comments to the Commission regarding the proposed changes to Rule 5.500 released on May 4th, 2023. REV appreciates the extensive work that the Commission has devoted to updating and improving the Rule. REV members report, for example, that the elimination of the Fast Track screening step in favor of a waivable Preliminary Review and the incorporation of new language recognizing the divergence between nameplate capacity and export capacity are changes that will make the interconnection process faster, more efficient, and more effective at integrating much needed renewable generation and storage. REV does see opportunities for additional improvements in the Rule by more widely recognizing the implications of export flexibility from sources such as storage and planned curtailment, extending the period for over which an Interconnection Agreement can be executed and a project energized, and eliminating new language requiring “as built drawings” be submitted to the Interconnecting Utility.

While the Commission is to be lauded for incorporating new language around project export capacity, there are multiple ways to not only limit how much energy is sent to the grid but to shape generation profiles to facilitate interconnection. These include strategic curtailment as well as energy storage, and can significantly change a project’s potential impact on grid infrastructure. We would encourage the Commission to look not just at the maximum export capacity but also to require that utilities look at the timing that energy from a project is injected into the grid if the project propose to control injection timing. A broader perspective here would lay the foundation for a more cost-effective integration of renewable resources that supported reliability and lower overall system costs.

Additionally, we believe that renewable development and the public good would be served by extending the period for an Interconnection Agreement to be executed and the resulting project energized without loss of the Interconnection Agreement. An Interconnection Agreement must currently be executed within one year and the project energized within one year thereafter. Extending the period for an agreement to be executed and/or the project energized to 18 months would balance accommodating the volatility in the renewable supply chain that has been seen in recent years against the need to prevent failed or heavily delayed projects from blocking projects that are later in the interconnection queue.

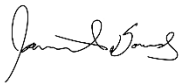
REV opposes the inclusion of a new requirement to deliver “as built drawing” after a project is completed (5.516(I)). Similar requirements were raised in the Commission Order dated 6/16/2022 in Case 21-0861-RULE but opposed by both the development community and the utilities (see e.g. Vermont Electric Coops 6/22/2022 Comments in that case) and the provisions were ultimately not included in Rule 5.400. As REV stated in that case, material changes to projects must be approved by and documented for the Commission and it is unclear what additional benefit is provided by requiring such drawings after the project has been completed and

material changes documented. REV strongly recommends striking these provisions in their entirety. If the Commission rejects this suggestion, then REV recommends replacing the word “drawings” with the word “diagrams.” In the interconnection application, utilities receive single-line (also called one-line) diagrams, not full construction plansets. If post construction documentation is required it should be consistent with the materials supplied in the application process.

Finally, give the latitude that 5.504 leaves for utilities to develop group and serial study process within tariff cases and the significant impact these procedure could have on project timelines, REV requests that the Commission notify all parties in the case – and especially REV and the Interstate Renewable Energy Council – of any tariff case that includes these provisions.

Thank you for the opportunity to comment.

Sincerely,



Jonathan Dowds
Deputy Director