



April 19, 2018

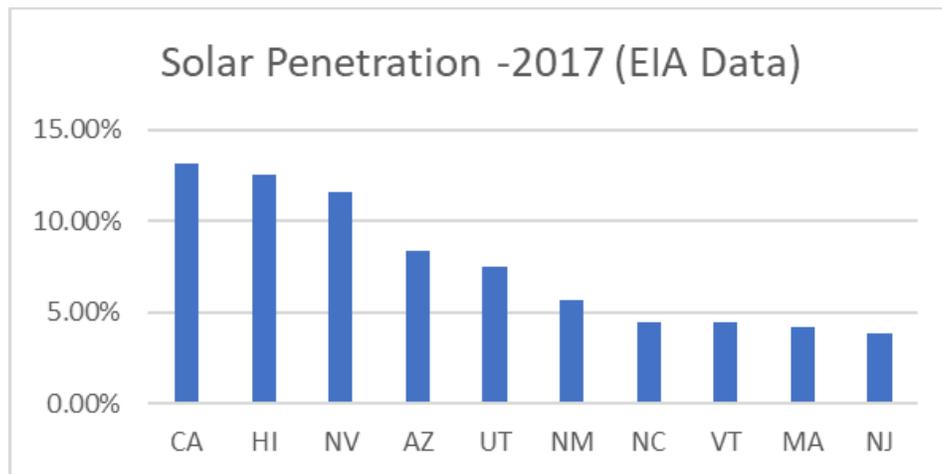
Mrs. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620

Re: Case No. 18-0086-INV Biennial Update of Net Metering

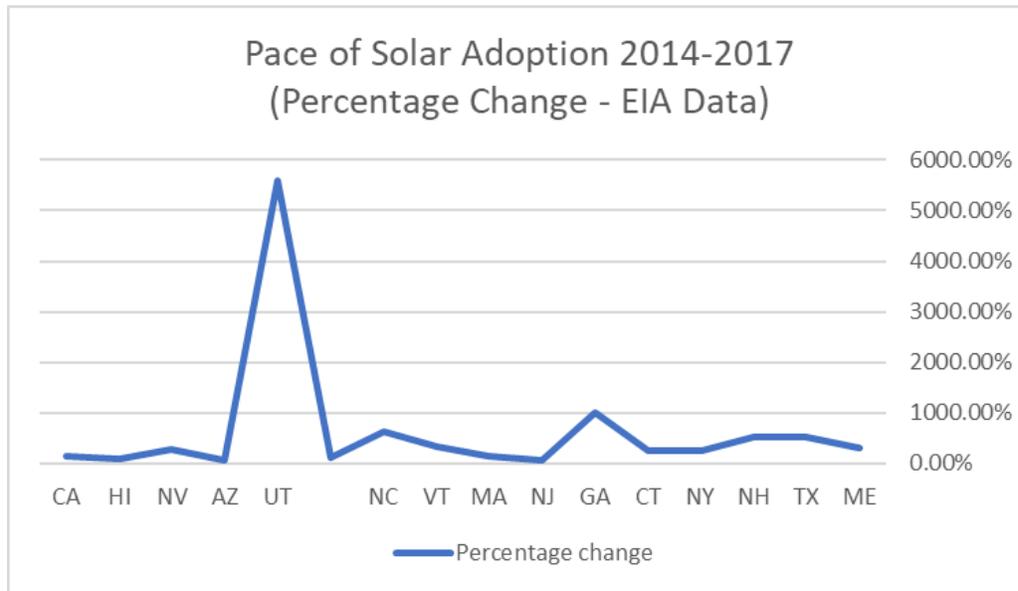
Dear Commissioners,

Renewable Energy Vermont (REV) greatly appreciates the Commission's diligence in reviewing numerous comments submitted regarding the first biennial update of net metering rule 5.100. Given the expedited process and timeline of the proceeding, REV offers brief reply comments to address a keystone issue of local renewable energy deployment pace and clarify facts for the record.

Vermont's solar penetration is only around 4.5%, a strong indication of how far Vermont is from meeting its comprehensive total renewable energy commitments. The simple clear metric for solar penetration is the amount of electricity renewable generation systems produce on an annual basis divided by the annual electricity delivered in Vermont. By this metric as shown by the following data from the U.S. Energy Information Administration, Vermont is far behind the national leaders of CA and HI who are around 13%. It is not appropriate to compare total load or peak demand to MW of installed solar when evaluating solar penetration or the amount of new renewable energy generation needed to achieve the State's comprehensive energy plan commitments.



Further, as shown by the following plot from EIA data, Vermont's solar adoption rates do not lead the nation and are commensurate with the efforts being undertaken by many other states.



Regarding the value of additional distributed renewable energy generation, particularly net metered solar and concerns about rate pressure, it is vitally important to differentiate between new net metering project bill credits (effective January 1, 2017) and historical net metering projects. The only independent empirical economic analysis provided via comments in this proceeding are from Synapse Economics. The Synapse analysis showed negligible bill impacts – on average of less than a nickel a month per customer for net metering 2.0 projects, due to the changes that the Commission implemented in 2017 (lower adjustors, statewide blended average rate, net metering customers pay a customer charge / minimum bill to utilities, individual customer caps, etc.). It costs more to mail a customer their monthly bill than enable continued access to local renewable energy choices and self-generation through net metering. From the broader perspective of a full societal cost benefit consideration, the value of net metering is overwhelming. The Synapse report estimated the annual contribution to Vermont’s economy of the net metering systems installed under net metering 2.0 in 2017 as being over \$22 million.

Vermonters want to do their part to address climate change and build the clean energy grid of our future. Local renewable energy production via net metering is key to our security and energy independence moving forward. Again, REV sincerely appreciates the opportunity to weigh in on these important issues.

Respectfully submitted,

Olivia Campbell Andersen
Executive Director
Renewable Energy Vermont

Renewable Energy Vermont’s members work to eliminate reliance on dirty fossil fuels by increasing clean, renewable energy and energy efficiency in Vermont. Vermont’s clean energy economy directly enables at least 19,080 jobs at 3,751 businesses, representing approximately 6% of Vermont’s workforce. Together, we will achieve 90% total renewable energy (electric, thermal, transportation) before 2050. Learn more at www.revermont.org.