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Via Email: PSD-REPrograms@vermont.gov

Department of Public Service
Attn: Renewable Policy and Program Comments
112 State Street
Montpelier, VT 05620-2601

Re: Vermont renewable energy policy additional comments

Dear Department of Public Service Renewable Policy & Program Staff,

Green Mountain Power (“GMP”) will participate actively in any process, on any timeline, the Department puts in place for the consideration of changes to Vermont renewable energy policy, including procurement programs such as net metering and the Renewable Energy Standard (“RES”). The joint comment letter filed by all electric distribution utilities sets forth a comprehensive list of policy areas that GMP agrees should be explored during the process; GMP submits these separate comments to highlight important context for these discussions.

To fight climate change, we have to focus on our customers—households and businesses—and help them switch away from fossil fuels used by the two largest contributors to emissions in Vermont, transportation and heating. Electricity, already a far cleaner solution, provides key transportation and heating alternatives for Vermonters, through EVs, heat pumps, and various load management platforms and programs that help coordinate their usage. Choosing electric can not only cut harmful emissions but also can directly help our customers save money. Every bit of increased usage will help drive down rates for all customers by covering the cost of providing service. Electricity is also more efficient and currently far less expensive than petroleum fuels.

Helping customers access clean energy in ways that increase equity and keep electricity affordable will in turn drive the transition away from fossil fuels and enhance demand for more renewable electricity, both locally and regionally. We should work to modernize existing policies and programs, designed years ago without current realities in mind, to support those efforts. For example:

- When RES was designed, offshore wind and other larger new sources of regional renewable energy were not being developed at scale; our RES does not have any provision for new renewables beyond the very narrow definition of Tier II.

- At that time, other states had not yet created mandates for clean energy that encompass resources, such as large hydro, that Vermont already recognizes; now Massachusetts has put in place a Clean Energy Standard that requires large volumes of these existing resources to meet carbon reduction, and others are moving in the same direction.
- When Vermont first supported net metering, hardly any solar had been built here; now, GMP's territory alone has over 370 MW of solar (as of June 30, 2022), more than half GMP's annual peak demand.

Vermont continues to be one of the leaders nationally in deployment of distributed solar generation. We should all be proud of the work we have done together in Vermont over the last 15+ years to lead the way on solar. While Vermont has been a model for the country, leaving our existing policies the same will leave Vermont behind. We now need to evolve our approach to once again show how energy innovation and partnership can change lives for the better.

Vermont can lead the way in getting distributed energy resources of all types to scale, quickly and affordably, for all. This includes not only solar but also storage, EVs, and all the new technology and upgrades that will be needed at individual customer homes and businesses—along with the charging and connected infrastructure that will be needed throughout Vermont to coordinate and support the greater grid. This will require extraordinary cooperation, thoughtful use of resources (including new federal dollars that become available to Vermont), and careful policy choices to make this energy transition equitable and affordable for all Vermonters. Through the Department's process and elsewhere, GMP looks forward to continuing to help create ways to deliver clean energy programs to more Vermonters, more cost-effectively than current policy allows.

Sincerely,



Liz Miller