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GMP Comments on the 2022 Comprehensive Energy Plan
Review of Draft for Public Comment

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We would like to thank all of the staff at the Department of Public Service who worked to produce the 2022 Comprehensive Energy Plan (CEP). The CEP services as a cornerstone in planning for Vermont's energy future and we are pleased to see a clear focus on the ways we can use our clean electricity supply to reduce our reliance on carbon intensive sources of energy. It truly is a transformative time as Vermonters shift how they drive and heat their homes in order to combat the top two sources of carbon pollution in Vermont. GMP and the other distribution utilities help that transformation by delivering to our customers a clean, renewable electricity portfolio backed by a reliable, resilient, and responsive grid.

GMP supports the DPS's strong focus in the CEP to help cost-burdened Vermonters take part in this energy transformation. Designing programs that make sure all customers benefit, minimizing cost-shifts, is critical as we address climate change in an equitable way.

GMP provides the below comments and considerations regarding the draft CEP:

Chapter 3 – Achieving CEP Goals in a Just and Equitable Manner

GMP is pleased to see the emphasis placed on ensuring equity in the identified pathways needed to achieve the goals of the CEP. The work needed to meet our GHG emission reductions cannot be considered complete if it is out of reach or unavailable to customers. We support more work to reach low-income customers in an equitable way, working collaboratively with external partners to make sure we are doing the right things to achieve the best outcomes to truly help folks. This can include enhanced outreach, designing more programs that avoid cost shifts, and ensuring equitable access through incentives and more.

Chapter 4 – Grid Evolution

Page 4-17 begins to discuss the use of Advanced Metering Infrastructure as a foundational element of the modern grid. AMI has and continues to have a very important role in the flow of data along with providing other tools such as the ability to switch and report outages. That said, we are beginning to look beyond the traditional AMI system to best serve customers, including newer technologies and innovations that provide much more than just metering, such as smart load panels or battery storage systems. The AMI systems rely on a specific, dedicated communications network along with physical solid-state meters on homes and businesses. With the development of new technologies that can provide

multiple value streams to benefit customers, we are looking at how we provide not only metering infrastructure, but also improved resiliency, readiness for future electrification, and creating the integrations needed to run a distributed energy resource platform in the face of climate change. GMP will continue leveraging the AMI for the significant benefits that system provides while at the same time focusing on the next iteration of technology for an integrated distributed two-way energy resource system. Thus, we encourage the Department to consider looking beyond the AMI with respect to distributed energy resource management as a way to best serve Vermonters in the future.

Chapter 5 – Transportation and Land Use

As noted on page 5-1, transportation fuels include more fossil fuels than any other energy source in Vermont and are responsible for producing more GHG emissions than any other sector. GMP agrees with the overall pathways set forth in the CEP, especially #1: Accelerating Vehicle Electrification as that pathway can allow us to reach our goal in this sector faster than other measures. We look forward to continuing to a partner in this transformation, especially by helping to increase the availability of public fast chargers around the state. A few detailed comments to consider:

- Page 5-5. “The Department of Energy estimates that the average cost of electricity in Vermont is equivalent to a gasoline price of \$1.73 per gallon.” Based on what MPG and what electricity price?
- Page 5-8, Exhibit 5-5 (graph). We assume y-axis is hundreds of thousands of registrations. What are inputs for each scenario (biofuels, BAU, etc.)?
- Page 5-9. Vehicle electrification pathway. “Other ongoing challenges in Vermont and elsewhere include the electric utility framework around vehicle charging.” We believe the statement may deserve further explanation or Vermont context. GMP is proud of the work being done to ensure that charging rates share benefits with participating customers without shifting costs inequitably to others, and agrees that EV charging rates should be equitable and cost-effective.
- Page 5-16. Public EVSE. “All these charging stations will be future proofed to be able to be upgraded to higher power as PEV demand takes hold and batteries become larger.” GMP agrees with this point as future proofing will also allow adding ports as EV adoption accelerates.
- Page 5-16. Electrify America. We note that in addition to Lebanon, New Hampshire, Electrify America is also building a DCFD location in Colchester, Vermont.
- Page 5-16. Workplace charging. “First, the availability of workplace charging makes it more likely that a consumer will purchase a PEV. Second, there could be an opportunity for vehicle charging to help balance the renewable generation located in Vermont with the loads to support grid efficiency.” GMP agrees with the points raised on the importance of workplace charging and plans to continue our engagement with customers on these solutions.

Chapter 6 – Thermal & Process Energy Use

Offering Vermonters a simple and cost-effective way to transition off fossil fuels through Tier III programs is foundational to achieving the state’s clean energy future. These programs have helped cut carbon and costs for thousands of customers, with more work needed. We support the DPS’s commitment in the CEP that any enactment of a Clean Heat Standard (CHS) that is part of Tier III is additive, “[...] ensuring that CHS levels are set such that savings incremental to Tier III programs are made” (page 6-35). Tier III is one of the best ways utilities can cut costs to benefit all customers through strategic electrification. Growing usage directly helps offset many cost pressures beyond a utilities control, and any enactment of a CHS must support this continued Tier III work.

Chapter 7 – Electric Resources

As noted in GMP’s recently filed Integrated Resource Plan (IRP), revisions to the Renewable Energy Standard (RES) will be important as Vermonters increasingly turn to clean electricity in the years ahead. There is opportunity as part of a revision to develop more renewables, more cost-effectively, for more Vermonters. GMP notes that RES changes could be considered legislatively well ahead of need, to permit RES to be adapted to ensure Vermont best meets the Global Warming Solutions Act requirements, in a cost-effective and equitable way (page 7-38).

Further, the CEP appropriately discusses that the current RES program structure features a disincentive to retire RECs from some renewables that are eligible for so-call premium renewable requirements in other states. The CEP also recognized (page 7-19) that a planning challenge for Vermont will be to meet increasing winter loads with renewable power, something not considered in the current RES framework. Both of these are significant planning considerations which GMP has explored in the Portfolio Evaluation chapter of our recently filed IRP, and we are open to RES modifications that attempt to address them.

Grid Constraints and Siting.

In Chapter 7 (as well as in Chapter 4), the CEP notes that the grid is seeing areas of constraint on the transmission and distribution (T&D) systems. The value of distributed generation (DG) depends in part on where it is interconnected on the grid. We are glad to see the DPS recognize these issues and recommend steps to encourage location of new generation in areas where the grid has sufficient capacity and it delivers the most benefits to customers.

Thank you for the opportunity to comment on the draft CEP. We recognize how much effort and analysis has gone into this document and look forward to its final release. Please reach out with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Castonguay". The signature is stylized and cursive.

Josh Castonguay