

WASHINGTON ELECTRIC COOPERATIVE, INC.¶  
PROPOSED EDITS TO NET METERING LEGISLATION VERSION 1-7-13

1. Page 1, line 14. Statement of legislative intent.

The reference to "cooperative" should be changed to "utility." WEC believes this pilot program should be available to all utilities.

2. Page 1, line 15. Statement of legislative intent.

The reference to "an exemption" changed to "an alternative pilot program"

3. Page 7, line 7-12. This section allows RECs to be transferred back to the utility, if the customer elects to convey them to the utility. WEC should consider the following edit to lines 8-11:

"I declare whether the customer retains ownership of the environmental attributes of any electricity generated by the net metering system ~~in excess of the customer's consumption~~ during each billing period or transfers ownership of those attributes to the interconnecting electric company."

4. Page 8, lines 15-19. This section should clarify that the blending of rates should be by "rate class." For example, "If the applicable rate schedule includes inclining block rates, the rate used for this calculation shall be a blend of those rates by their respective rate class determined by adding"

5. Page 10, line 10. The sentence should read: "The board may raise the 15 percent cap upon receipt of a petition by a Vermont distribution electric company."

6. Page 11, lines 4-11, subsection (I). This is the corollary to the section referenced above at p. 7, line 7-12. The question is whether an electric utility should get ownership of the full environmental attributes, not just the excess net of the customer's consumption. Accordingly, one could utilize the following edit at lines 4-7:

"At the option of a net metering customer of the company, may receive ownership of the environmental attributes of electricity generated by the ~~customer's net metering system in excess of the customer's consumption~~ during each billing period, including ownership of any associated tradable renewable energy credits."

7. Page 14, line 6-9. Subsection (d) should be retained. It serves the purpose of adding clarity to the operation of the statute.

8. Pages 18-19, subsection (n). WEC believes as a matter of fairness, this pilot program should not be limited to cooperatives.

9. Page 19 l. 15-18 of subsection (c) to be stricken in its entirety and replaced with the following:

An electric company that meets and maintains the renewable energy achievement requirements of subdivision (1) of this subsection shall be relieved of obligation to make net metering available under this title if it submits a proposed tariff for an alternative net metering program to the Board within 90 days of meeting the achievement requirements or otherwise obtaining approval of an alternative net metering program in accordance with subdivision (2) of this subdivision.

10. Page 20, line 11-Page 21, l. 1.

if an electric company that meets the requirements of subdivision (1) of this subsection may propose to the Board a rate schedule to implement a net metering program in its service territory ~~that is consistent with the company's supply portfolio~~ that may have a capacity limit that differs from the limit contained in the definition of net metering system, that may require the company to own all or a portion of the environmental attributes of generation within the program and any associated tradable renewable energy credits, offsetting only energy charges, customer charges or other charges to capture fixed costs necessary to support the utility's infrastructure, and that may provide for credit amounts, bill procedures, or energy measurement methodologies that are alternative to the requirements of subsections (e) (credits; single meter systems); (f) (credits, group net metering systems), (g)(requirements, group net metering systems), and subdivision (h)(1)(K) required solar incentive of this section

11. Page 32, l. 15-16 (subsection (b)).

Unless otherwise provided under an achievement tariff pursuant to 30 V.S.A. § 219a(o), a net metering customer shall pay the same rates, fees, or other payments

12. Page 33, l. 13-14.

Another subsection would be added and subsection (D) to state: "considers equity amongst distribution utilities."

Numbering/lettering would be refigured going forward.

13. Page 36, l. 11-18. WEC finds the language and intent here confusing. WEC would like further clarification of the intent of this provision, and may have suggestions thereafter.