H.40 Sec. 1	http://legislature.vermont. Definations:	g Test	Issue	Action
рд 3	(13) (A) "new Renewable Generation"	(A) Energy from within a system of generating plants that includes renewable energy shall not constitute new renewable energy, regardless of whether the system includes specific plants that came or come into service after December 31, 2004 June 30, 2015.	Understandable that this be excluded from "new renewable" defination - but should be included in "existing renewalbe" defination	copy and move this language to (7) "Existing renewable energy"to make it clear that HQ is defined as Tier 1
pg 4	(17) (A)	(A) For purposes of this subdivision (17), methane gas and other flammable gases produced by the decay of sewage treatment plant wastes or landfill wastes and anaerobic digestion of agricultural products, byproducts, or wastes shall be considered renewable energy resources, but no form of solid waste, other than agricultural or silvicultural waste, shall be considered 10 renewable.	Food waste needs to be included as acceptable source of renewable energy. Biodigesters on farms will be using both agricultural waste and food waste to produce electricity)	1. Add "food waste" 2. If farmer wants to add some fast growing "crop" like switch grass to the bio digester is that permitted and called renewable?
Sec. 2				
pg 8	a. Establishment: requirements	(a) A retail electricity provider may meet the required amounts of renewable energy through eligible tradeable renewable energy credits, eligible renewable energy resources with renewable energy credits still attached, or a combination of those credits and resources	HQ does not have RECs but has renewable attributes.	Use langauge in pg. 15 Sec 3 (a) (1) (A) "To satisfy this requirement, a provider may use renewable energy with environmental attributres attached or tradeable renewable energy credits generated by and renewable energy plant."

The board shall adopt the rules and procedures that are necessary to allow the Board and the Department to implement and supervise further the implementation and maintenance of a renewable portfolio standard. In its rules, the Board may allow a provide that has met the required amount of renewable energy in a given year to retain tradeable renewable energy credits created or purchased in excess of theat amount for application to the provider's required amount of renewable energy in one of the following years

 line 18 - used "renewable portfiolio standard" is this intentional & consistent.
banks for only 2 years not 3 **1. Request 3 years - offers greatest** flexibility protects agains unnecessary rate impacts (not a big deal)

*** 2. Request unlimited banking for tier 3. There are no RECs to sell any over compliance with the tier should be able to count in future years – no reason to incent limiting deployment of projects. (very important)

pg 9 (c) Alternative compliance In lieu of purchasing renewable payment (ACP) energy or tradeable renewable

In lieu of purchasing renewable ACP to CEDF - recommend one energy or tradeable renewable energy change credits or supporting energy transformation projects to satisfy the requirements of this section and section 8005 of this title, a retail electricity provider in this State may pay to the CEDF established under section 8015 of this title an alternative compliance payment at the applicable rate set forth in section 8005. ACP from tier 3 should be used to provide incentives for transformation projects for customers in the utility service territory.

Sec. 3 RESET Program Categories

Pg 11

pg 15	1. (A) Purpose: establishment	To satisfy this requirement, a provider may use renewable energy and environmental attributes attached or tradeable renewable energy credits generated by any renewable energy plants whose energy is capable of delivery in Vermont	This language caputures HQ's renewable attributes	Use this language in defination of renewable energy
pg 15	(B) Required amounts	The amounts of total renewable energy required by this subsection shall be 55% of each retail electricity provider's annual sales during the year beginning January 1 2017, increasing by an additional one and one-third percent each subsequent January 1, untiil reaching 75% on and after January 1, 2032	Increaseing by 1 and 1/3% every year rather than 4% every 3 years limits flexibility	For tier 1 only request the underlying language be keep in so that the requirement would need to be met each third January 1 until reaching 75% on and after 2032. Every 3 years the requirement goes up 4% - this offer greater flexibility for power planning - less reporting requirements - example: output from wind/solar could be low one year and robust the other - helps to balance out.
pg 19	(C) Eligibility criteria.	(C) For an energy transformation project to be eligible under this subdivision (a)(3): ii. The project shall (II) meet the need for its good or services at the lowest present value life cycle cost, including environmental and economic costs; and (III) cost less per MWH than the purchase of tradeable renewable energy credits for distributed renewable generation	What is this saying? Innovative projects can easily cost more than "RECS" - Innovation is not the least costs and could be more than Renewable Energy - this could limit Transformation Projects. For example If in a year RECS market could drop dramatically would it put a halt to Innovation tier?	I understand there is new language to clarify - 2. In addition we recommend adding langague that gives the PSB ability to allow for demonstration or pilot projects that have higher costs.

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pg 20	(E) Other sources:	(i) An enegy transformation project under this subdivision (3) shall deliver services through persons other than a retail electricity provider unless one of the following applies: (1) Service delivery through the provider is more cost-effective than delivery by another person or there is no person other than the provider willing and able to deliver the services	-	Delete this language - cannot legislate partnerships -
pg 22	(F) (4) Alternative Compliance	(A) The alternative compliance payment rates for the categories established by this subsection (a) shall be: (i) total renewable energy requirement -\$0.01 per kWh; and (ii) distribted renewable generationand energy transformation requirements - \$0.07 per kWh	(i) .01 per kWh (tier 1) (ii) .07 for tier 2 -	Tier 2 at .06 - reduce rate impact in the event for whatever reason resources are not available06 is orignal level recommended by PSD
pg 25	(d)	Low-impact hydropower. A hydroelectric renewable energy plant shall be eligible to satisy the distributed renewable generation or energy transformation requirement only if, in addition to meeting the definition of distributed renewable generation, the plant is and continues to be certified by the Low-impact Hydropower Institute of Portland, Maine	Does required certification by the Low-Impact Hydropower Institute of Portland, Maine - impact hydro facilities that could otherwise count toward tier 2?	This does not apply to Tier 1?