

**Comments on 2016 VT Senate Bill S.230,
Energy Development Improvement Act**
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- Public Assistance Officer
 - Could be helpful for all parties to have a central resource for discussion of any potential issues.
 - Having a neutral third party could prove more effective (for both sides) than the current scenario.
 - The current CPG approval process is rigorous and comprehensive... we think it would actually be helpful to have a designated resource available to the public to help outline the process that the applicant needs to go through to receive a CPG and to provide thoughts on potential avenues for real discourse and discussion with the petitioner.
 - This individual could also provide feedback to the E-PSB website for more efficient and effective interaction through that portal, once it is up and running.
- Socialization of costs of extending 3 phase power to less aesthetically impactful locations
 - The reason we see so many projects along main thoroughfares in VT is because that is where the 3 phase networks generally run and with the current construct of both the net metering and Standard Offer programs (under a competitive, capacity constrained (15% cap) model for net metering, and under the reverse auction for the Standard Offer program), the cheapest projects (which would have the lowest interconnection costs) are the most viable ones.
 - Simply stated, more sensitively sited projects are often at a competitive disadvantage in the current landscape.
 - We agree with the concept of having the ratebase support the additional costs of siting generation in less impactful locations.
- Standard Offer carve-out for projects sited in “preferred locations”
 - We support the provision to allow for projects in “preferred locations” to compete amongst themselves under the reverse

- auction mechanism for the Standard Offer (including landfills, brownfields, rooftops, parking lots, gravel pits, etc.)
- We would suggest taking it a step further and offering a larger percentage of the SO be allocated here, as the cost to ratepayers will not be considerably more than using greenfield sites, especially considering the limited allocation remaining in the Standard Offer program.
 - Encore would recommend that $\frac{2}{3}$ to $\frac{3}{4}$ of the Standard Offer be allocated for “preferred sites”, consistent with the public’s interest in siting generation in these locations.
 - Encore would also suggest that two or more separate “buckets” be utilized to address the varying cost and production amounts of the different project types (e.g.: one for rooftops; one for landfills; one for gravel pits, etc.).
 - We would also stress the importance of keeping the current landfill carve-out for larger net metering projects in 30 VSA 219a intact and extend the customer base to include non-municipal customers, as well as removing the utility permission requirement.
- Allowing for collocation of projects in municipally preferred locations
 - Anything that can be done to allow for guidance as to where communities would prefer to see generation resources would be helpful, provided that these locations are not otherwise constrained by other environmental or technical issues and do not limit the development of other viable projects in the community, but rather serve as a priority list of locations.
 - Requirement for decommissioning fund for smaller projects
 - We do not agree with this provision as such a mandate will only add cost and we don’t see a scenario where these plants will go unused or be abandoned following useful life. These projects will be fully developed and permitted facilities, interconnected into the grid... they will be assets that will continue to have financial value. Should this provision be deemed absolutely necessary by the general public, we would suggest a statewide funding mechanism (such as a line of credit or other similar mechanism)

for decommissioning. Finally decommissioning is commonly accepted by the industry to be a cash positive endeavor as there will be an after market for panels, wiring, inverters; scrap value of steel, etc.

In summary, we believe that S.230 is a step in the right direction in that it appears to modify slightly the current process for siting and permitting distributed electrical generation facilities in Vermont without upending the process which could result in a reversal of the solid work that Vermont has done to get us to this point.