

P. O. Box 512
Montpelier, Vermont 05602
February 24, 2016

Senate Committee on Natural Resources and Energy
State House
Montpelier

Dear Committee Members:

I am writing to suggest some changes to S.230 that relate to ownership and retirement of renewable energy credits associated with net metering systems.

I am an individual net metering generator, a customer of Green Mountain Power. My system is roof-mounted, less than 3 kW in capacity. My system typically generates the equivalent of 3 renewable energy credits a year. I have been following net metering a number of years now; testifying on relevant portions of various energy bills, including act 99 (2014) and act 56 (2015). I also participated extensively in the workshops and comments used to develop the post-2016 net metering program and to a lesser extent for the development of the renewable energy standard with regard to tiers I and II.

Section 7a of draft 2.2

I ask that you adopt Section 7a of draft 2.2 (2/9/16). This is an important step for disclosure of ownership of renewable energy credits. I have requested that the Public Service Board do this in the proceedings under acts 99 and 56. The monitoring system is still under development under the act 56 workshops. This is an important part of full and accurate disclosure on who gets the benefits of the environmental attributes generated by renewable energy systems in Vermont.

Section 8 of draft 2.2

I appreciate the motive for this section 8, so that environmental attributes generated in Vermont actually benefit Vermont environmentally. I think an additional modification will better serve the owners of small net metering systems while not detracting from the benefits to the utilities and to the state as a whole. The additional modification will be to allow each utility to meet its renewable energy standard through a combination of renewable energy credits that it retires and renewable energy credits that are retired in Vermont by owners of renewable energy systems connected to that utility.

To adopt my proposal will require the following changes to the net metering program.

- Change 30 V. S. A. § 8010 (c)(H). This change will require that the system owner make one of three choices when requesting a certificate of public good: 1) transfer the environmental attributes (which include the REC's) to the utility for retirement in Vermont; 2) retain and retire the environmental attributes in Vermont; or 3) retain and sell the environmental attributes.
- Implement the monitoring from section 7a of this draft.
- Change § 8005, probably in (a)(1)(B). This change will allow each utility to meet its

renewable energy standard by including electricity generated under choice 2. Or, if one is worried about double-counting, then each utility's goal would be reduced by the amount of electricity generated under choice 2.

- Modify the proposed requirement (§ 8005 (c)(H)(ii)) to allow owners who have elected choice 2 (retain and retire in Vermont) to retain and retire their environmental attributes beginning January 1, 2023.

I think that this modification will better serve owners of small, individual net metering systems because it allows them to:

- fully benefit from their investment in a net metering system,
- truthfully claim that their electricity is clean, green, carbon-free, nuclear free, and
- retain their environmental attributes without hindering the utility from meeting its requirement

Thank you for reading these comments. I urge you to consider them and to include my suggestions in S.230.

Sincerely,

Thomas Weiss, P. E.