

# Energy Storage Regulation - Recommendations



# 2017: Act 53 Storage Report

- On or before Nov. 15, 2017, Commissioner of Public Service “shall submit a report on the issue of deploying energy storage on the Vermont electric transmission and distribution system.”
  - Summarize existing state, regional, and national actions or initiatives affecting deployment of energy storage;
  - Identify and summarize federal and state jurisdictional issues regarding deployment of storage;
  - Identify the opportunities for, the benefits of, and the barriers to deploying energy storage;
  - Identify and evaluate regulatory options and structure available to foster energy storage, including potential cost impacts to ratepayers; and
  - Assess the potential methods for fostering the development of cost-effective solutions for energy storage in Vermont and the potential benefits and cost impacts of each method for ratepayers.
- Report can be accessed at:  
<http://publicservice.vermont.gov/content/energy-storage-study>

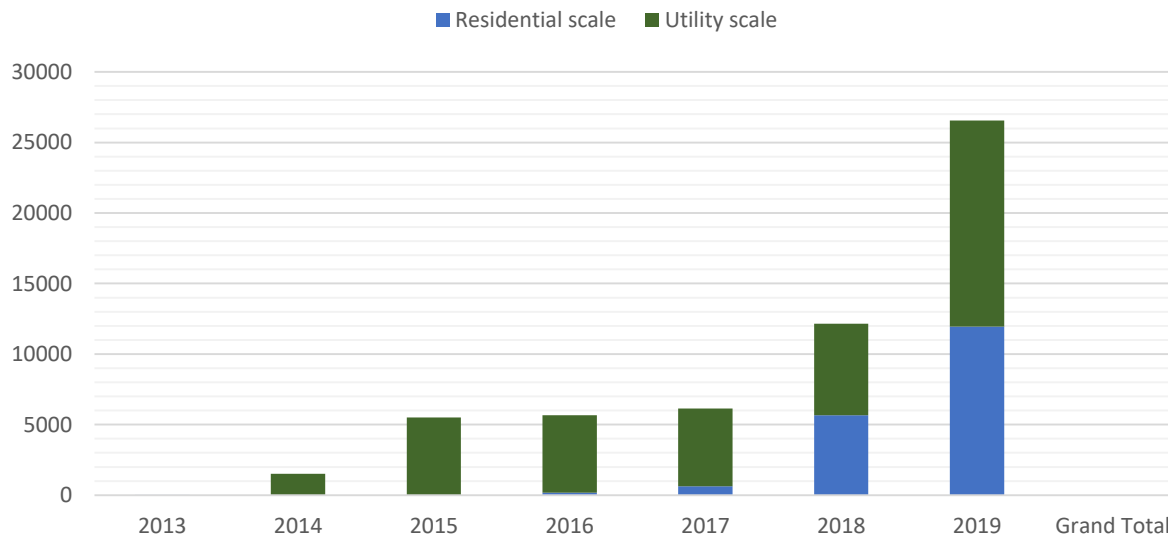
# 2019/20: Act 31 Storage Regulation Recommendations

- “On or before January 15, 2020, the Department of Public Service, after consultation with stakeholders, shall provide to the General Assembly recommendations, including proposed statutory language, for the regulatory treatment of storage facilities.”
- Process
  - Meetings with utilities and developers during September 2019
  - Draft recommendations for comment issued November 1, 2019
  - Written comments received from the Agency of Natural Resources, Department of Public Safety, Public Utility Commission, Vermont Electric Power Company, and Mr. Bram Towbin
  - Final recommendations issued January 9, 2020
  - Will be posted to <https://publicservice.vermont.gov/content/2019-energy-storage-regulatory-recommendations-2017-energy-storage-study>

# Goals of regulation recommendations

- Provide a clear path to permitting storage projects
- Ensure storage projects and their operations do not adversely impact the grid or ratepayers; and
- Provide public and environmental safety

Total kilowatts (kW) of installed battery storage in VT



# Recommendations

- Clarify the PUC's general jurisdiction over storage absent specific modifications to Title 30 requirements;
- Offer specific modifications to Title 30 requirements for storage facilities including a presumption of waivers of 30 V.S.A. § § 107-109 and – except for aggregators - § 231;
- Require storage over 100 kW be subject to 30 V.S.A. § 248 review, with appropriate process modifications for smaller and aggregated storage facilities and storage facilities interconnected or otherwise co-located with renewables;
- Recommend an appropriate pathway for siting and interconnection review of storage facilities;
- Offer potential revisions to various PUC rules to include storage.

# Questions?

<https://publicservice.vermont.gov/content/2019-energy-storage-regulatory-recommendations-2017-energy-storage-study>

Anne Margolis

[anne.margolis@vermont.gov](mailto:anne.margolis@vermont.gov)