

Vermont Public Power Supply Authority

Testimony of Kenneth A Nolan

House Energy & Environment Committee

H. 289 Draft 1.2 (1/18/2024 - EMC - 12:42 PM)

January 24, 2024

General Position

- VPPSA supports the overall framework negotiated by the RES Working Group participants
- VPPSA generally supports H.289 Draft 1.2 with several proposed small clarifying tweaks
- The elimination of group net metering in the agreement is extremely important to VPPSA is reaching an overall settlement.
 - We recognize the concerns of the affordable housing community with retaining access to offsite renewable generation and continue working toward a viable resolution
 - Any solution to their needs must be narrowly defined to maintain the overall RES framework agreement

Clarification

Page 18 lines 18 to 21 – VPPSA agrees with meeting all load growth after 2035 with new renewables.

However, because Swanton is a 100% renewable utility its post-2035 requirement is determined by page 18 lines 13 to 16. To meld the two requirements together Swanton needs to be exempted from this section.

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Proposed Specific Language Revisions

Page 15 line 6 – revise the reference to “6,000 customers” to “7,000 customers

Lyndon Electric is close to 6,000 and we would prefer the provision treat all VPPSA members the same

Page 21 line 18 – should not change “retail electric sales” to “load” on this particular line.

Making this change would change the basic threshold for determining which utilities qualify as 100% renewable energy utilities and could remove their exemptions.

Changing the requirements to “load” in other sections is fine, but this one line should be left as is

Page 23 lines 18 to 21 – Could be interpreted as contradicting allowance for municipal and utility owned hydro to qualify as distributed generation.

Suggest insertion of “that are not owned by a retail electric provider” after the word “plant” on line 18 in order to make clear that utility owned hydro generators qualify