



H. 289

(As advanced by the House Committee on Environment and Energy)

COMMENTS OF ALLEARTH RENEWABLES, INC.

AllEarth Renewables, Inc. (“AllEarth”) offers these comments regarding the above bill as it comes for consideration by the House Committee on Ways and Means.

As set forth in AllEarth’s comments filed with the Committee on Environment and Energy, eliminating nearly all group net metering would be a serious mistake at a time when electrification will create a very large need for renewable generation, and when Vermont’s only other statutory renewable generation procurement program- the Standard Offer program- is winding down. While AllEarth recognizes and appreciates that H.289 has now evolved to recognize the importance of actual procurement and in Section 8 sets out a requirement for a report on a replacement program for group net metering, the interplay of that section with the rest of the bill has the incongruous result of that report not being due until *after* the ability to permit group net metering projects has expired.

Fortunately, there is a simple change that can be made to produce a much more rational result. If the proposed amendment to 30 VSA §8002 (16)(E)(i) found on page 4 of the bill is changed to allow applications under the current system until December 31, 2025 rather than December 31, 2024, there will be time for consideration of the substance of the report that is due on January 15, 2025 pursuant to Section 8 of the bill. This change preserves the opportunities that group net metering affords for renters, participants in future community solar arrays, affordable housing communities and other Vermonters who have no other meaningful solar energy access beyond what group net metering provides. It will also allow time for the report to meaningfully evaluate the impacts of (1) the changes to the Public Utility Commission’s net metering rule that take effect less than three weeks from now on March 1st, and (2) the July 1, 2024 biennial adjustment to net metering rates that takes place under that same rule. The state’s electric utilities have full opportunity to participate in the rate adjustment proceeding to advocate for any cost-related concerns they may have.

Thank you for this opportunity to comment.

David Mullett

David Mullett, General Counsel
AllEarth Renewables, Inc.
118 Firehouse Drive
Bristol, VT 05443
dmullett@allearthrenewables.com