

Dear Sen. Cummings and the Senate Finance Committee,

Having reviewed Renewable Energy Vermont's proposal regarding S.112, the PUC housekeeping bill, the issues raised by REV do not appear to be minor housekeeping and are not germane to this bill.

VCE has supported citizen involvement in numerous solar cases, including those sized 2.2 MW and above. We have seen issues with distribution line upgrades appear in only one 2.2 MW case, and that involved a complicated situation with three 2.2 MW projects all on the same 76 acre parcel in which the developer is attempting to interconnect the projects separately to comply with the single plant issue. The existing distribution line requires some upgrading and in some cases goes through wetlands. ANR's review has been appropriate. However, most recently, GMP filed in the case that they need to upgrade the line anyway, and GMP will bear the cost, not the developer.

I suggest the committee ask REV and ANR to identify the specific cases where this issue has been a problem. Only recently have we seen a number of projects larger than 2.2 MW (which are generally under the Standard Offer program). There are larger issues associated with some of these larger projects, as one developer is using PURPA, is choosing sites that may or may not provide benefits to the grid, but the utilities must take the power. I am aware of one case where GMP entered into an agreement to purchase the power, but the project is an area that does not have local load to serve and seems to be continuing the pattern of not building solar where it is most beneficial.

The larger issues raised by this request go to the heart of the problems we are seeing with solar development where the developer-driven process is not necessarily resulting in the siting of projects in locations that are beneficial to Vermonters. At this time, the way developers are operating often without any community or utility involvement in the development of their projects, it is appropriate that developers bear the financial cost of distribution line upgrades. I am glad to see the utilities and ANR will be testifying as perhaps they will detail more about what we are seeing.

Thank you for the opportunity to weigh in on this. VCE does not support amending S.112 to include REV's issue in this PUC housekeeping bill. We do think it is time for the state's energy policies and siting process to be taken up by the legislature, and not as part of an update to the RES as presented in the bill that has been introduced on that topic.

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