

We have been reviewing the proposal from the PUC and heard the testimony from Ellen yesterday. Given her comment on the storage changes towards the end of Sec. 1 (starting on the bottom of page 3), we wanted to send along a few brief comments to support a request that removes those changes at this time until folks have had a chance to review it a bit more.

Green Mountain Power has been working with a provider of mobile storage, which we view as a key part of our overall storage strategy – large-scale mobile battery backup that can go where it is needed in the case of outages or emergency situations. As drafted, proposed change to 30 V.S.A 248(u) could raise policy issues beyond just housekeeping cleanup for larger scale mobile storage. GMP supports clarification and alignment of definition to ensure grid connected resources receive an interconnection review, but revisions to Sec. 248 & Sec. 201 may require more discussion and refinement.

The PUC has a docket open right now to develop battery storage rule. It has held workshops but has not developed a draft rule yet. It would be beneficial to allow that process to advance further to refine issues related to battery storage regulation before amending existing statutory regime, so as to not create any confusion or unintended consequences in the interim as to scope of PUC regulation over storage.

Thank you for your understanding and work during a very busy week!

Candace

--

Candace Morgan
Green Mountain Power
802-488-4111