

As you review the House changes to S.202, we wanted to write share our support of the bill with the House proposal of amendment. Brightsaver, a national organization that promotes plug-in solar products, wants the Committee to remove Section 2(d) from the House-passed version of S.202. We strongly urge the Committee to retain this provision. Section 2(d) was added for customer fairness and equity in response to concerns raised by distribution utilities regarding cost allocation. While we hope and expect that these products will operate safely and without adverse impacts on the electric system, it would be irresponsible to require customers who are not able to buy these products to bear the financial burden of any system damage that may result from their use.

This issue is fundamentally about equity and accountability. Customers who choose not to install or use these products should not be exposed to unknown costs created by products they neither requested nor benefit from directly. Section 2(d) establishes a reasonable and necessary safeguard to ensure that costs remain appropriately assigned. We are regulated in Vermont and these safeguards are needed for all the Vermonters we serve.

We raised these important points during Senate committee discussions and understood due to timing there would be an opportunity to address this important fairness issue during House consideration, which ultimately resulted in the inclusion of Section 2(d). We would have serious concerns if the committee chooses to remove the provision at the request of Brightsaver and instead recommend support for the bill as amended by the House.

Thank you for your consideration.

Andrea Cohen, Vermont Electric Cooperative  
Louis Porter, Washington Electric Cooperative  
Candace Morgan, Green Mountain Power