

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 17-2813-PET

Petition of Green Mountain Power for a Certificate of Public Good pursuant to 30 V.S.A. § 248(j), authorizing the installation and operation of a battery storage system on the GMP Solar Panton Project site located in Panton, Vermont, to be known as the “GMP Panton Battery Storage Project”

**THE DEPARTMENT OF PUBLIC SERVICE’S COMMENTS
REGARDING GREEN MOUNTAIN POWER’S MOTION
FOR NON-SUBSTANTIAL CHANGE DETERMINATION**

On July 15, 2020, Green Mountain Power Corporation (“GMP”) submitted a Motion for Non-Substantial Change Determination to the Public Utility Commission (“Commission”) for proposed changes to the GMP Panton Battery Storage Project. GMP proposes to add (i) an additional 1,500-kVA pad-mounted transformer and pad-mounted recloser containing communication equipment, (ii) an equipment pad that would increase the impervious surface on the site by approximately 1,140 square feet, (iii) three pole-mounted reclosers on existing GMP distribution poles, and (iv) additional communication equipment to be installed in an existing relay cabinet.¹

Pursuant to PUC Rule 5.408, an amendment to a Certificate of Public Good (“CPG”) is required for a “substantial change” in an approved project where the change “has potential for significant impact” with respect to 30 V.S.A. § 248(b) or § 248(a) criteria.

After reviewing the relevant § 248 criteria for the proposed changes, the Department of Public Service (“Department”) does not oppose GMP’s Motion for Non-Substantial Change Determination. This project may benefit all GMP customers by clarifying the additional equipment needed, costs incurred, and benefits stemming from inverter and renewables-based islanding. The Department concludes this sufficiently justifies the cost of islanding. However, this is conditioned on the difficult-to-quantify benefits of gaining experience with islanding an inverter-based system.

To the extent that the Commission relies on the cost-benefit estimates provided in Mr. Shields’ prefiled testimony², the Department finds that additional review of the methodology is appropriate. The Department would be concerned with developing precedent on reliability cost estimating without a

¹ See GMP Motion for Non-Substantial Change Determination, Case No. 17-2813-PET at 4 (July 15, 2020).

² “The economic value of islanding these 51 customers was estimated by the ICE Calculator to be approximately \$100,000 net present value (“NPV”) over a 40-year benefit timeframe.” Affidavit of Kirk Shield at 5 (July 14, 2020).

thorough review. The Department does not support the general concept of increased storage-based reliability for specific GMP customers paid for by all GMP customers without an understanding of adequate reliability and a demonstration that storage is the least-cost solution to achieving the defined level of reliability.

Assuming the Commission concludes an operational understanding of the islanding provides sufficient benefit under § 248(4) (economic benefit), the Department recommends that the Commission affirm GMP's non-substantial change determination request to allow prompt installation of the equipment. The Department is not recommending additional review of 30 V.S.A. § 248(b)(2) (need) and § 248(b)(4) (economic benefit) in this matter.

DATED at Montpelier, Vermont this 7th day of August 2020.

Respectfully submitted,

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc: ePUC Service List