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**State of Vermont  
Public Utility Commission**

**MEMORANDUM**

To: Will McNamara, Sandia National Laboratories  
From: Dominic Gatti, Clean Energy Innovator Fellow, Mary Jo Krowleski, Utilities Analyst, <sup>MJK</sup>  
John Cotter, Deputy General Counsel <sup>JC</sup>  
Re: Vermont Public Utility Commission creation of energy storage systems rule  
Date: June 15, 2023

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Overview

The Vermont Public Utility Commission (“PUC”) has undertaken a proceeding to craft rules specifically governing energy storage systems in Vermont in Case No. 21-3883-RULE. At the CESA Federal-State Policy Summit on May 17 and 18, 2023, Sandia National Laboratories (“Sandia”) presented some of its work on energy storage policy and spoke about its policy and outreach efforts. The PUC would like to explore the possibility of tapping into Sandia’s expertise as we develop our rule.

Organizational Interaction

Understanding that Sandia has no material stake in the outcome of the Commission’s rulemaking efforts, below are some possible means of interaction the Commission would like to discuss:

- Sandia responding to PUC requests for information/comments in Case No. 21-3883- RULE;
- Sandia participating in future workshops conducted by the Commission Case No. 21-3883-RULE;
- Sandia presentations to PUC staff on top issues on energy storage and best practices and other requested topics;
- Exchange of written questions and responses between the PUC and Sandia;
- Possible meetings to discuss a questions as they arise.

## Topics of Interest

There are several areas that Sandia experts might be able to contribute their technical expertise to increase the effectiveness of the PUC's rulemaking. The items below are a preliminary list of topics the PUC is interested in learning more about:

- Fire and electrocution safety; incorporating applicable technical standards;
- Language and approaches to ensure technology flexibility/agnosticism in regulatory standards;
- Regulatory approaches for encouraging energy storage operation in line with State and grid goals;
- Current and near-term communication/telemetry capabilities and related opportunities;
- System optimization and utility visibility/control for grid efficiency and stability;
- Effects of aggregation on the Vermont grid and the interplay between various owners and operators of energy storage system; and
- Strategies for maximizing co-benefits of energy storage and renewable energy generation.

## Next Steps

If Sandia is able to provide us with expertise, we would like to set up a meeting to discuss terms for engagement. As part of that discussion, the PUC will need you to provide us with any relevant information regarding contractual or financial obligations expected by Sandia over the course of this possible collaboration. Please contact John Cotter ([john.cotter@vermont.gov](mailto:john.cotter@vermont.gov)) or Dominic Gatti ([dominic.gatti@partner.vermont.gov](mailto:dominic.gatti@partner.vermont.gov)) to set up an initial meeting.

**From:** [Anderson, Holly](#)  
**To:** [Jwmcnam@sandia.gov](mailto:Jwmcnam@sandia.gov)  
**Bcc:**  
**Subject:** VT Public Utility Commission re: Vermont Public Utility Commission creation of energy storage systems rule  
**Date:** Thursday, June 15, 2023 10:14:00 AM  
**Attachments:** [21-3883 -RULE memo to Sandia Labs FINAL.pdf](#)

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Hello Mr. McNamara,

Please see the attached Memorandum from the VT Public Utility Commission regarding the creation of energy storage systems rule.

Thank you,

Holly R. Anderson (she/her)  
Clerk of the Vermont Public Utility Commission  
ePUCSystem Administrator

Vermont Public Utility Commission  
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