

State of Vermont General Assembly  
Renewable Energy Standard Reform Legislative Working Group

**RESRWG Member Pre-Meeting Survey, November 9-13, 2023. COLLATED  
RESPONSES**

**1. Please enter your name and organization. [Open Text](#)**

Noted in order of appearance in survey results

Darren Springer, Burlington Electric

Mia Watson, Vermont Housing Finance Agency

Brian Evans-Mongeon, Village of Hyde Park

William Driscoll

Associated Industries of Vermont

Christopher Pearson

VT Sierra Club

Rebecca Towne, Vermont Electric Cooperative

Louis Porter, Washington Electric Cooperative

Ken Nolan – VPPSA

Peter Sterling, Renewable Energy Vermont

**2. What questions do you have regarding the SEA modeling data? Enter N/A and advance to next slide, if this doesn't apply to you. [Open Text](#)**

A. How was the assumption that the rate of net metering penetration would decline significantly reached? Louis Porter, Washington Electric Cooperative

B. Was it assumed there would or would not be changes in policy related to net metering? Louis Porter, Washington Electric Cooperative

C. Where does the SEA levelized cost of energy fall in the range of new renewable price forecasts? Understanding this is important because it is the biggest driver of SEA's rate impact calculations for new renewables. Peter Sterling, Renewable Energy Vermont

**3. What questions do you have for the Brattle Group, regarding macroeconomics data?  
Enter N/A if this question does not apply to you. [Open Text](#)**

- A. Will there be an analysis of actual rate impacts for various scenarios, beyond total costs and savings? Mia Watson, Vermont Housing Finance Agency
- B. Does the data/analysis include assumptions about the economic impact or impact on beneficial electrification of electrical rate increases driven by net metering? Louis Porter, Washington Electric Cooperative
- C. Does the data/analysis include assumptions about the economic impact or impact on beneficial electrification of electrical rate increases driven by net metering? Louis Porter, Washington Electric Cooperative
- D. Without seeing the study in advance it is difficult to have specific questions. Overall, I want to understand how they are handling the cost side of the equation - not just the benefits. Ken Nolan – VPPSA
- E. How should we consider these results in relation to individual utility territories and the regional impacts of various scenarios? Ken Nolan – VPPSA
- F. How did they model electric rates? If a composite was used, how was it developed? Ken Nolan – VPPSA
- G. Is Brattle Group performing any 2030 estimates of the economic impact of in state renewables or just 2035? Peter Sterling, Renewable Energy Vermont
- H. In the Brattle Group's analysis, how much of the expense of post 2024 net metering incorporates offsite net metering projects? This is important to understand because it is feasible that this part of the net metering program will be eliminated beginning in 2025 Peter Sterling, Renewable Energy Vermont

4. **Task 7: Where does the RES currently create inequities in the way that benefits & burdens are distributed?** [Open Text](#)

Entries are roughly organized into by topic per the Facilitator Jennifer Knauer's understanding of the comment.

**Comments regarding the distribution of Household Burden, General**

- A. It is intended to be a balanced program that provides costs and benefits for all ratepayers. As currently implemented Tier 3 supports enhanced incentives for low-income customers. Darren Springer, Burlington Electric
- B. LMI households, particularly renters, are limited in their ability to benefit from a cleaner grid if they cannot afford to invest in electrification of their homes. Mia Watson, Vermont Housing Finance Agency

**Comments regarding Standard Offer Program**

- C. The current standard offer incentive program only applies to utilities that were not 100% renewable, and does not equally spread the higher cost of those incentives between utilities. Rebecca Towne, Vermont Electric Cooperative

**Comments regarding Net Metering**

- D. Net metering is a large inequity - with required value for excess generation to net metering customers almost 8cents over market creating a cost shift and driving higher rates for all. Rebecca Towne, Vermont Electric Cooperative
- E. The greatest inequity is not with the RES specifically but with net metering. The highly advantageous rules and compensation for net metering means that non net metering customers pay more. Louis Porter, Washington Electric Cooperative
- F. Net metering also raises the cost of renewable power unnecessarily, reducing the speed of beneficial electrification. Louis Porter, Washington Electric Cooperative
- G. The treatment of net metering is inequitable and shifts costs among customers. The fact that net metered REC "must" be retired in Tier 2 translates the inequality into the RES. Ken Nolan - VPPSA

**Potential Impacts of Imposing [New] Limits on Sources**

- H. If changes to RES limit the use of certain resources, including hydro or in-state local wood, that could negatively impact ratepayers and local jobs and economic activity. Darren Springer, Burlington Electric
- I. To the extent that the RES and related renewable energy policies force utilities to purchase clean energy that is more expensive or less reliable than alternative clean energy options, ratepayers generally bear unduly higher costs or reliability risks. William Driscoll, Associated Industries of Vermont

- J. I continue to believe the inclusion of Tier 2 requirements creates inequities in that it de facto pushes (although not explicitly requiring) generation be built within a DU territory. Ken Nolan – VPPSA

**Uncategorized**

- K. Moving to 100% clean energy will remove some of the current inequities by ensuring all Vermonters have access to clean energy regardless of their individual circumstance. Rebecca Towne, Vermont Electric Cooperative
- L. Any potential increase in rates attributable to the RES will be disproportionately felt by low-income households, which typically have a higher energy burden. Mia Watson, Vermont Housing Finance Agency

**5. Task 8: How would you like to see the RES address the inequity of distribution of benefits of renewables between different residential properties? [Open Text](#)**

**Uncategorized. Organized here per poll participant.**

Reform net metering. Ensure continued availability of low-income programs through Tier 3. Keep Tier 1 and other eligibly broad, and do not restrict resources.

--Darren Springer, Burlington Electric

Unclear if net metering will be part of discussion, but would like to see projects serving LMI households, including multifamily affordable housing, included as a preferred site

--Mia Watson, Vermont Housing Finance Agency

- If the residential customer is solely for their own benefit, then they should be afforded all benefits or encumbrances associated with such.
- If the customer is yielding benefits, or part of a utility based program, the customer should have some level of their engagement recognized, but other customers should also have some benefits.
- Overall, distribution of benefits or costs for the renewables should be borne by those engaged either in standalone, or aggregate efforts.

--Brian Evans-Mongeon, Village of Hyde Park

Policies like net metering need to be reviewed and revised to eliminate unwarranted cost shifts between ratepayers.

--William Driscoll, Associated Industries of Vermont

- By putting the distribution utilities in charge of procurement it ensures an effective market model and equal costs shared between all customers.
- Net metering subsidies must be addressed in a significant way to reduce the big cost shift / rate impact - net metering is not available or feasible for many, and with 100% renewable not necessary

--Rebecca Towne, Vermont Electric Cooperative

Net metering should be compensated at a rate that matches actual avoided costs. In other words, it should take into account the cost of other sources of renewables and of needed infrastructure.

-- Louis Porter, Washington Electric Cooperative

- I would like the RES to be as flexible as possible with minimal restrictions on how the DU's manage their portfolios. This would allow utilities to address their local circumstances
- Net metering reform needs to be incorporated into any RES modification.
- I don't necessarily think all equity issues should be handled in RES. Siting reviews need to consider equity concerns and give proper signals.
- One of the VPPSA managers pointed out that once utilities are 100% renewable the value of compensating individual customers extra for "going renewable" (which is not accurate) is questionable.

- Ken Nolan - VPPSA

**Closing Page [Thank You]**