



VILLAGE OF HYDE PARK

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May 7, 2021

Ms. Holly Anderson
Clerk of the Commission
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 21-1705-NMR, Letter of Objection

Dear Ms. Anderson,

The Village of Hyde Park Electric Department ("HPE") offers this letter of objection to the application of XXXXXX for a 10.26 kW net-metering system.

HPE provides information to demonstrate that the interconnection of this net-metering system should not be advanced. As required, HPE provides actions to the applicant for resolution.

INFORMATION DEMONSTRATING THAT THE SYSTEM SHOULD NOT BE ADVANCED

Energy New England LLC provides a historical record that logically predicts additional net-metering on the single HPE distribution circuit will result in excess generation flowing onto the GMP B20 transmission line.

- In August 2016, HPE energized a 1MW 100% Village owned solar array on the one distribution line circuit feeding from HPE's one substation.
- HPE's load went negative 161 times in years 2018-2020 due to cumulative net-metering additions.

Ms. Michelle Cosica, Senior Energy Analysis, Energy New England LLC provided this data.

HPE Minimum Load Data 2017-2020

| Min of RTLO Month | Year 2017 | 2018 | 2019 | 2020 |
|----------------------|--------------|--------|--------|--------|
| January | 0.021 | 0.444 | 0.619 | 0.774 |
| February | 0.277 | 0.081 | 0.470 | 0.413 |
| March | 0.252 | 0.047 | 0.163 | 0.000 |
| April | -0.008 | -0.104 | -0.115 | 0.002 |
| May | -0.094 | -0.118 | -0.087 | 0.003 |
| June | 0.141 | -0.107 | -0.111 | 0.054 |
| July | 0.079 | -0.008 | 0.072 | 0.284 |
| August | -0.007 | 0.000 | -0.062 | -0.065 |
| September | -0.037 | 0.013 | 0.001 | -0.120 |
| October | 0.006 | -0.077 | 0.002 | -0.022 |
| November | 0.291 | -0.031 | 0.053 | 0.184 |
| December | 0.586 | 0.488 | 0.444 | 0.861 |

Village of Hyde Park 2019, Net Metering Avoided Cost Projection Summary Report: prepared by Energy New England LLC, presented on October 14, 2020 to Ms. Maria Fischer, Public Service Department; in compliance with the Public Utility Commission's order. Please reference the Data Tables provided on the following page.

DATA TABLES

kWh

| | Pre-NM 2.0 | Category I | Category II | Category III | TOTAL |
|----------------------------|------------|------------|-------------|--------------|---------|
| Reduced Retail Sales (kWh) | 139,246 | 10,792 | 2,330 | | 152,368 |
| Excess Generation (kWh) | 57,052 | 67,719 | 212,613 | | 337,384 |
| Gross NM Generation (kWh) | 196,298 | 78,511 | 214,943 | | 489,752 |

COSTS

| | Pre-NM 2.0 | Category I | Category II | Category III | TOTAL |
|---|-------------|--------------|--------------|--------------|--------------|
| Reduced Retail Sales (\$\$) | \$ 6,674.63 | \$ 2,463.29 | \$ 4,889.96 | | \$ 14,027.88 |
| Excess Generation Credits (\$\$)* | \$ 9,137.72 | \$ 11,326.02 | \$ 35,559.53 | | \$ 56,023.27 |
| Value of Generation/Avoided Cost (\$\$) | \$ 6,047.86 | \$ 2,418.83 | \$ 6,674.41 | | \$ 15,141.10 |
| Above-market cost (\$\$) | \$ 9,764.49 | \$ 11,370.48 | \$ 33,775.08 | | \$ 54,910.05 |

ABOVE MARKET COSTS –The sum of Reduced Retail Sales and Excess Generation Credits less the value of avoided costs. **ADMIN and BILLING COSTS**- admin and billing costs have not been requested.

Any flow of electricity onto the distribution grid from this net-metering system that is in excess of HPE needs will result in a financial burden most largely felt by low income ratepayers who already pay a higher percentage of income toward their electric bills.

RECOMMENDATIONS TO THE APPLICANT FOR RESOLUTION

HPE presents recommendations as to how system impacts might be resolved by the applicant.

HPE requests that all CPG applications made in 2021 be denied until the utility system can safely accommodate new net-metering.

Step 1.

In accordance with the terms and conditions of this section, HPE will hire the professional engineering firm ControlPoint Technologies to perform a preliminary engineering review of the utility system and an initial feasibility report of potential impacts to the system. ControlPoint expects this work to take thirty (30) days from contract signing, depending on Vermont's COVID state of emergency and impacts to ControlPoint operational staff.

HPE will contract ControlPoint Technologies within 10 (ten) business days after HPE receives \$5,000 for their work. Once the contract is signed, \$5,000 is non-refundable, except that, if the Step 1. ControlPoint final bill is less than \$5,000, the difference will be refunded if the applicant decides to not advance or applied to the applicant's cost for Step 2., if the applicant decides to advance. In the event that ControlPoint charges exceed \$5,000, the applicant must pay HPE in full before advancement. The applicant will receive this preliminary report within ten (ten) business days following receipt by HPE.

Step 2. In accordance with the terms and conditions of this section, HPE will hire the professional engineering firm ControlPoint Technologies to perform a System Impact Study based on the findings in Step 1. ControlPoint expects this work to require forty-five (45) days after contract signing.

A System Impact Study takes a deeper look into HPE's distribution system up to the high side terminals of the substation transformer. As a part of this study, ControlPoint

would determine maximum backfeed potential onto the transmission system and notify GMP of this potential.

ControlPoint Technologies, Senior Manager, System Planning provided a rough estimate of \$7,500 for the work in Step 2., noting that the actual cost of Step. 2 could be greater based on findings in Step 1.

The System Impact Study does not include work with GMP other than providing notification of the maximum backfeed potential onto the transmission system. If the Step 2. ControlPoint final bill is less than \$7,500, the difference will be refunded if the applicant decides to not advance or applied to the applicant's cost for Step 3., if the applicant decides to advance. In the event that ControlPoint charges exceed \$7,500, the applicant must pay HPE in full before advancement. The applicant will receive this report within five (5) business days following receipt by HPE.

Step 3. GMP would determine to what level of study, or if further study is required on their system, and any GMP billed cost related to this application are borne by the applicant. HPE is unable to provide details about the GMP processes.

In the event that GMP requires ControlPoint Technologies to provide additional time toward this application, that cost is borne by the applicant. To advance, a non-refundable amount must be paid by the applicant, and a refund in the event that ControlPoint final charges are less than the non-refundable amount paid by the applicant. If ControlPoint final charges exceed the non-refundable amount, the applicant must pay these charges to HPE prior to interconnection.

HPE believes that we have provided information to demonstrate that the interconnection of this net-metering system should not be advanced. We appreciate your consideration of our letter of objection.

Sincerely,

Carol Robertson

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General Manager
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