

112 State Street  
4<sup>th</sup> Floor  
Montpelier, VT 05620-2701  
TEL: 802-828-2358



TTY/TDD (VT: 800-253-0191)  
FAX: 802-828-3351  
E-mail: [psb.clerk@vermont.gov](mailto:psb.clerk@vermont.gov)  
Internet: <http://psb.vermont.gov>

**State of Vermont  
Public Service Board  
MEMORANDUM**

To: E-Mail Service List re Rule 5.500

From: Jake Marren, Mary Jo Krolewski, and John Gerhard

Date: May 8, 2017

Subject: Information Requests for Vermont Electric Distribution Utilities and Request for Comments

---

This memorandum provides a summary of the issues that were addressed at a workshop held on May 2, 2017, to review potential changes to Vermont Public Service Board (“Board”) Rule 5.500. The Vermont Department of Public Service (“Department”) filed a proposed rule on September 9, 2016.<sup>1</sup>

As discussed further below, Board Staff hereby request information from the Vermont electric distribution utilities, to be filed by no later than June 2, 2017.

In addition, other non-utility participants are hereby provided notice that additional comments concerning this rulemaking may be filed with the Board by June 16, 2017.

Finally, participants are requested to contact the Clerk of the Board to confirm their interest in continuing to receive communications from the Board concerning this rulemaking. Additional instructions about how to do this are provided below.

**Summary of Issues Discussed at the May 2, 2017, Workshop**

On Tuesday, May 2, 2017, a workshop was held to discuss potential revisions to Board Rule 5.500, which governs interconnection procedures. At the workshop, the following issues were discussed:

1. Should interconnection applications be filed through the Board’s electronic document management system (ePSB)? The Department’s proposed rule appears to contemplate ePSB being the mechanism for filing interconnection requests. The group discussed

---

<sup>1</sup> The proposed changes to Rule 5.500 can be found at: <http://psb.vermont.gov/about-us/statutes-and-rules/proposed-changes-rule-5500>.

whether it is more appropriate for interconnection requests to be filed using other procedures, such as filing requests directly with the interconnecting utility.

2. Should utilities be allowed to interconnect projects that fail the fast track screening criteria using the “Supplemental Review process” as opposed to traditional interconnection studies? The group discussed the supplemental review process.
3. Should the Board adopt model agreements? Under the current version of Rule 5.500, the Board was supposed to adopt model agreements for various interconnection situations (i.e. a model System Impact Study agreement). The Department’s proposed rule contains similar requirements. Participants discussed what agreements are currently being used and whether Board-adopted models are still necessary.
4. Should the amount of the application fee be set in the rule or in a tariff? The Department’s proposed rule sets an application fee of \$600 (the existing rule has a fee of \$300). Board staff requested information from the electric distribution utilities to document the basis for the proposed fee, including the costs associated with conducting a Fast Track Analysis. Board Staff requested further comment on whether each utility should adopt an interconnection application fee by tariff as opposed to the Board setting a state-wide fee by rule.
5. Whether the language of Section 5.503(a) and (b) of the Department’s proposed rule could be clarified to ensure that there is no regulatory gap between Rule 5.500 and the Board’s net-metering rule, Rule 5.100.
6. Whether addition clarification to the Department’s proposed rule’s provisions concerning site control is necessary.<sup>2</sup>
7. A discussion of how Fast Track Analysis are (or are not) completed when certain criteria are failed and whether this practice should be allowed under a revised Rule 5.500.

### **Information Requests**

In response to these discussions, we request the following information from the Vermont electric distribution utilities. If any non-utility participant has information relevant to these information requests, they may respond as well. All responses shall be filed with the Board by June 2, 2017. Filings may be made by email to [psb.clerk@vermont.gov](mailto:psb.clerk@vermont.gov). Please include Rule 5.500 in the subject line of any email.

1. Please provide an estimate of the cost to complete the following activities. In doing so please provide a narrative description of the assumptions and factors used to make such estimates.
  - a. Review of an interconnection application for completeness
  - b. Fast Track Analysis
  - c. Supplemental Review

---

<sup>2</sup> This topic was not addressed substantively due to cases pending before the Board relevant to this issue. However, the participants did express a desire for the Board to review the Department’s proposed rule text with this issue in mind.

2. Please provide a model of the following documents. If a utility does not have a model, please state this fact:
  - a. Interconnection Agreement
  - b. System Impact Study Agreement
  - c. Feasibility Study Agreement
  - d. Facilities Study Agreement

### **Request for Additional Comments**

Participants may file additional comments on the issues discussed at the May 2, 2017, workshop or comments about the proposed revisions to Rule 5.500 generally. All such comments shall be filed with the Board by June 16, 2017. Filings may be made by email to [psb.clerk@vermont.gov](mailto:psb.clerk@vermont.gov). Please include Rule 5.500 in the subject line of any email.

### **Administrative Matters: Email List**

The Board has multiple email lists of persons who may be interested in this rulemaking. The Clerk of the Board requests that all persons who wish to continue to receive communications concerning this rulemaking send an email confirming their interest in receiving information about this rulemaking. Please send these emails to [psb.clerk@vermont.gov](mailto:psb.clerk@vermont.gov). Future communications concerning this rulemaking will only be sent to those who request to receive such information.