

October XX, 2024

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620

Re: Vermont System Planning Committee reliability plan and energy efficiency geotargeting recommendations

Dear Ms. Anderson:

The Vermont System Planning Committee (VSPC) respectfully submits its recommendations for geographic targeting (GT) of energy efficiency as requested by the Public Utility Commission (PUC)¹, and the need for reliability plans in accordance with the Docket 7873 & 7874 Attachment II, Screening Framework and Guidelines for Implementation of 30 V.S.A. § 8005a(d)(2). These recommendations were developed by the Geotargeting Subcommittee (GTS) of the VSPC and were adopted by the VSPC at its quarterly meeting on October 23, 2024. The consolidated recommendations including both energy efficiency geographic targeting and the identification of areas requiring new reliability plans are consistent with the process improvements that were approved by the Commission on January 24, 2014 (EEU-2013-11).

SUMMARY

We make three recommendations in this letter:

1. No newly identified area “screens in” using the applicable screening tools for the potential to be resolved with non-transmission alternatives.
2. With regard to the status of current geographically targeted energy efficiency, no area is currently targeted, thus, no recommendation is needed regarding continuation or discontinuation of a current project.
3. No new areas have been identified where geographically targeted energy efficiency has the potential, as defined by the applicable screening tool, to cost-effectively avoid or defer an infrastructure project, so no new geographical targeting of energy efficiency should be undertaken.

Each of these recommendations is supported below.

¹ Pursuant to EEU-2010-06 Public Service Board Order of 2/16/2012, p. 6.

RECOMMENDATION 1—NO NEW RELIABILITY PLAN

Recommendation summary: In the VSPC's 2024 annual review of identified reliability issues, no utility identified an issue that screened in for the potential to be resolved with a non-wires solution. Therefore, no new reliability plans are recommended.

Rationale for the recommendation

Paragraph 1 of the Docket 7873 & 7874 Attachment II, Screening Framework and Guidelines for Implementation of 30 V.S.A. § 8005a(d)(2) states that:

The Vermont System Planning Committee ("VSPC") processes, reporting mechanisms, public engagement, and subcommittees shall be utilized for the purpose of making recommendations to the Public Service Board ("Board") regarding constraints within the electric grid, and the potential for non-transmission alternatives ("NTAs"), including new Sustainably Priced Energy Enterprise Development ("SPEED") standard-offer plants, to mitigate those constraints, pursuant to 30 V.S.A. § 8005a(d)(2).... The VSPC shall make its recommendations to the Board no later than January 1 of each year², or more frequently if constraints are identified or analysis is completed mid-year.

This filing, and the process by which it was developed, are designed to fulfill the requirement of the quoted paragraph.

The screening framework provides that transmission and distribution (T&D) constraints shall be screened for their potential to be resolved by non-transmission alternatives using the NTA screening tool adopted by the VSPC pursuant to the Docket 7081 Memorandum of Understanding. Distribution constraints are screened for non-wires alternative potential using the screening tool established in Docket 6290. The host utility may use either screening tool to screen sub-transmission constraints. A constraint that "screens in" using the appropriate tool requires a reliability plan be filed by the utility by April 1 following the January 1 due date of the VSPC recommendation (or more frequently if constraints are identified or analyzed mid-year).

The Geographic Targeting Subcommittee (GTS) of the VSPC obtained reports from all utilities to identify any areas that screened in. No new load growth-related project was identified by any utility.

RECOMMENDATION 2—NO AREA IS CURRENTLY GEOGRAPHICALLY TARGETED

Recommendation summary: With regard to the status of geographically targeted energy efficiency, no area is currently the focus of current geotargeting efforts, thus, no recommendation is needed regarding continuation or discontinuation of a current project.

² Subsequent to the order quoted here, the VSPC made various process improvements to harmonize the energy efficiency geographic targeting process with its Docket 7873/7874 Screening Framework obligations. The process improvements resulted in an earlier filing date for this letter, which fulfills the quoted "no later than January 1 of each year" requirement.

RECOMMENDATION 3—NO NEW AREAS WARRANT GEOGRAPHICALLY TARGETED ENERGY EFFICIENCY

Recommendation summary: No new areas have been identified where geographically targeted energy efficiency has the potential, as defined by the applicable screening tool, to cost-effectively avoid or defer an infrastructure project, so no new geographical targeting of energy efficiency should be undertaken.

Rationale for the recommendation

As described in recommendation 1, no new area has been identified by any utility that “screens in” and therefore requires a reliability plan as required by the Docket 7873 & 7874 Attachment II, Screening Framework and Guidelines. On the basis of this information, the VSPC concludes that no area of the state warrants new geographically targeted energy efficiency to avoid an infrastructure project.

PROCESS

The GTS is comprised of interested members of the VSPC and its meetings are open to the public. The GTS met once in the past year, and at its June 21, 2024 meeting heard presentations from the distribution utilities and VELCO regarding the need for planned upgrades of distribution and transmission facilities. Members of the GTS determined at the June 21 meeting that the planned upgrades presented at the meeting could not be addressed through non-transmission alternatives or geographically targeted energy efficiency. Materials and minutes associated with the GTS can be found at <https://www.vermontspc.com/vspc-at-work/subcommittees>. The GTS submits draft recommendations annually to the VSPC at the October quarterly meeting. The VSPC adopted the 2024 GT recommendations on October 23, 2024.

CONCLUSION

The VSPC respectfully submits the foregoing recommendations and welcomes questions from the Commission.

Sincerely,



Shana Louiselle
VSPC Secretary

cc: VSPC Distribution List