

October 29, 2018

Judith Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05612

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

Dear Ms. Whitney:

The Vermont System Planning Committee (VSPC) respectfully submits its recommendations for geographic targeting (GT) of energy efficiency as requested by the Public Utility Commissions (PUC)<sup>1</sup>, 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 17, 2018. 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 area has 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. A reliability plan addressing the Green Mountain Power (GMP) Hinesburg Area is currently in place, but as described in previous filings, the needs of the system in this area cannot reasonably be addressed with geographically targeted energy efficiency.

Each of these recommendations is supported below.

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

## **RECOMMENDATION 1—NEW RELIABILITY PLAN**

*Recommendation summary:* In the VSPC’s 2017 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 & 7847 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 plans, 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 year<sup>2</sup>, 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 GTS of the VSPC requested that all utilities identify any areas that screened in. No new load growth-related project was identified by any utility. Several utilities reviewed all upcoming T&D projects with the subcommittee.

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<sup>2</sup> 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 2—NO AREA IS CURRENTLY GEOGRAPHICALLY TARGETED**

*Recommendation:* 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.

## **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. One reliability plan is currently in place addressing the Green Mountain Power (GMP) Hinesburg Area, but as described in previous filings, the needs of the system in this area cannot reasonably be addressed with geographically targeted energy efficiency.

### ***Rationale for recommendation***

In its order dated March 3, 2017, regarding the Vermont System Planning Committee 2016 Reliability Plan and Energy Efficiency Geotargeting Recommendations, the PUC adopted the VSPC's recommendation that the Hinesburg reliability issue cannot be resolved with new geographically targeted energy efficiency.

Given the foregoing overview of previously identified areas, and the absence of a new area requiring a reliability plan, the VSPC concludes that no area of the state warrants new geographically targeted energy efficiency to avoid an infrastructure project.

## **CONCLUSION**

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

Respectfully submitted,

Shana Louiselle, VSPC Facilitator  
Vermont System Planning Committee

cc. Vermont System Planning Committee