

From: [Coster, Billy](#)
To: [Margolis, Anne](#)
Subject: RE: RE: Act 31 Energy Storage Regulation Draft Recommendations
Date: Wednesday, December 04, 2019 10:15:19 AM

Anne,

Thanks again for the opportunity to comment and for the extended deadline. On behalf of ANR, I have two comments for PSD to consider.

First – should there be a recommendation to modify the existing fee structures for PUC, PSD, and ANR - **30 V.S.A. § 248b** and **30 V.S.A. § 248c** – to establish application fees for storage projects?

Second – while the Agency understands that, under most use cases, increased deployment of storage can reduce or have a neutral impact on greenhouse gas emissions, we also understand that certain use cases may increase emissions over baseline. As the deployment of storage increases in Vermont, ANR will want to ensure that net GHG emissions is considered carefully by the PUC. Since the existing Sec. 248 criteria considers GHG impacts, no statutory revisions may be necessary at this time, but I would ask PSD to keep this consideration in mind and address it in the report if you determine that is necessary.

Thanks again!
Billy

Billy Coster
Director of Planning
Vermont Agency of Natural Resources
(802) 595-0900

From: Margolis, Anne <Anne.Margolis@vermont.gov>
Sent: Tuesday, November 26, 2019 12:41 PM
To: PSD - Energy Storage <PSD.EnergyStorage@vermont.gov>
Subject: RE: Act 31 Energy Storage Regulation Draft Recommendations

Dear friends,

We've received a request to extend the comment deadline to Wednesday, December 4. While we would appreciate comments by November 29th per our original request, we will accept them up through December 4th.

As a reminder, the comments are in relation to the Department's [draft recommendation options for public comment on the regulatory treatment of energy storage facilities](#), pursuant to [Act 31](#) of 2019. The Department's final recommendations will be submitted to the General Assembly by January 15, 2020.

Comments should be submitted to: PSD.EnergyStorage@vermont.gov.

Thanks and happy Thanksgiving,
Anne