

March 24, 2020

By First Class Mail and ePUC

Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, Vermont 05620-2701

Re: Case No. 20-0399-TF – Tariff filing of Green Mountain Power to revise the Power Supply, Retail Revenue and Exogenous Adjustors and adjust base rates to remove previous Exogenous Adjustor embedded in rates

Dear Ms. Whitney,

Green Mountain Power (“GMP”) files this letter in response to the Commission’s March 19, 2020 *Order Closing Petition Case, Granting Request to Delay Implementation of Upward Adjustments, and Setting Deadline for Recommendations*, in which the Commission approved GMP’s proposal to delay implementation of quarterly adjustors under GMP’s Multi-Year Regulation Plan. In addition, GMP writes to respectfully request that the Commission also approve one additional temporary delay of a component of a previously approved rate design, which is due to go into effect April 1, 2020, and which would result in a rate increase for a majority of customers affected by the change if not delayed.

In its March 19, 2020 Order, the Commission requested that GMP file updated tariffs reflecting the Commission’s approval to delay implementation of the proposed quarterly adjustors. After further review, GMP has confirmed that updated tariffs are not needed to implement this delay. Rather, GMP is withdrawing the proposed changes to the Record of Filings, specifically tariff sheet 29 (Power Supply Adjustor) and tariff sheet 31 (Exogenous Storm Adjustor), which covered the proposed quarterly adjustors. The already-in-effect tariffs properly describe the end date of existing adjustors, and these tariffs will remain in effect until such time as the Commission considers and approves any future changes. No other changes are necessary to implement the Commission’s March 19, 2020 Order.

However, following GMP’s continued review of potential ways to reduce financial impacts on customers with the onset of COVID-19 in Vermont, GMP is also proposing to delay the implementation of the fifth and final phase of the post-GMP and CVPS merger rate integration approved in Docket No. 8525 (“Step 5”) for six months. This delay would necessitate further tariff changes. As detailed further in the attached *Motion for Temporary Postponement of the Final Phase of Merger Rate Integration Due to COVID-19*, Step 5 of the rate integration, which is due to take effect on April 1, 2020, will result in a rate increase for

almost 20,000 commercial and industrial (“C&I”) customers. This implementation was previously approved, and already incorporated into the proposed tariffs filed in this docket. By delaying the implementation of this final step for several months, C&I customers affected by this step will continue to be charged existing rates under Step 4 of the rate integration and avoid changes during this time of unprecedented upheaval. A majority of C&I customers would see an increase under Step 5, and slightly less than half would see a decrease, if implemented. However, the approved delay of quarterly adjusters will already produce a decrease in rates for all customers, and on balance, during this unusual time and with so much rapidly changing, GMP believes that for the sake of stability and predictability for these customers, a temporary pause of this final step is the best approach at this time. As discussed further in the attached Motion, GMP is therefore proposing to delay the previously-approved implementation of Step 5 by six months for good cause, and has filed clean and red-lined tariff sheets incorporating the delayed implementation on ePUC.

As Step 5 was due to be implemented on April 1, 2020, GMP is requesting PUC approval of this proposed temporary delay as promptly as possible so that GMP can implement the appropriate rates. GMP has discussed this proposal with the other parties to the Memorandum of Understanding in Docket No. 8525—the Department of Public Service, GlobalFoundries U.S. 2 LLC, and Omya, Inc.—and understands they appreciate these unprecedented times and do not object to the Commission approving this limited delay to implementing the final rate integration changes. If approved, GMP will also provide notice to all customers affected by the proposal, advising them of the delay in Step 5. In the event the Commission does not authorize the pause of Step 5, GMP will implement the original proposed tariffs filed in this docket on February 12, 2020, with the exception of proposed changes to the Record of Filing tariffs, noted above.

Please do not hesitate to reach out with any questions. We greatly appreciate the Commission’s consideration of this proposal given the short timeframe necessitated by the growing crisis situation, as GMP seeks to provide as much relief as possible to its customers as we navigate these difficult times.

Sincerely,



Geoffrey H. Hand, Esq.
Counsel for Green Mountain Power

cc: Case No. 20-0399-TF Service List (via ePUC)

Encls.