



**State of Vermont
Public Utility Commission**

MEMORANDUM

To: Parties in Cases Before the Public Utility Commission
From: Ann Bishop, ePUC Project Manager *AB*
Re: Remaining Outstanding Compliance Filings to be Filed in Case in Which Amended CPG or Consent to Transfer CPG Is Issued
Date: September 20, 2019

Since the implementation of ePUC, the Vermont Public Utility Commission (“Commission”) has directed holders of certificates of public good (“CPG”) who want to amend or transfer their CPGs to file those requests as new cases in ePUC.¹ There are two primary benefits to this approach. First, filings are being made in ePUC rather than in the original “paper” cases. Second, filings are not made in closed ePUC cases, thereby ensuring that they are promptly seen by Commission staff.

However, this approach has led to some confusion regarding where remaining outstanding compliance filings should be filed --- in the original CPG case or in the case in which an amended CPG or a consent to transfer a CPG is issued. The Commission has determined that:

- **When the Commission issues a new document** (either an amended CPG or a consent to transfer a CPG), any remaining outstanding compliance filings *should be filed in the case in which the new document was issued* and the original CPG case will be closed;
- **When a net-metering CPG is transferred by filing a form with the Commission and no “consent to transfer” document is issued**, any remaining outstanding compliance filings *should continue to be made in the original CPG case* and the CPG transfer case will be closed; and
- **When a notice of minor amendment to a net-metering CPG is filed and no amended CPG document is issued**, any remaining outstanding compliance filings *should continue to be made in the original CPG case* and the notice-of-minor-amendment case will be closed.

¹ All parties to the original CPG case are automatically parties to the CPG amendment or transfer case.

To implement this determination:

- **When a new case is filed requesting Commission approval to amend or transfer a CPG**, Commission staff will use ePUC's new enhanced cross-referencing ability to add a link to the new case in the original CPG case.²
- **When the Commission issues an order approving an amendment or a transfer:**
 - the order will include a paragraph reminding the parties that all remaining compliance filings related to the CPG that is amended or transferred by that order should be made in the new amendment or transfer case; and
 - the Commission will issue a separate order closing the original CPG case that will state that all remaining compliance filings related to the CPG should be made in the new amendment or transfer case.
- **When a net-metering CPG is transferred by filing a form with the Commission and no "consent to transfer" document is issued**, if there are any outstanding compliance filings and if the original CPG case was processed in ePUC, Commission staff will add the new CPG holder as a party to the original CPG case and will make the former CPG holder "inactive" in that case. This will allow the new CPG holder to file the remaining compliance filings in ePUC.

If you have any questions about this change to ePUC, you may contact the ePUC System Administrator at puc.ePUCadmin@vermont.gov or 802-828-2358.

² Because the filer provides the original CPG case number when filing the new amendment or transfer case, ePUC automatically creates the cross-reference to the original CPG case in the new amendment or transfer case.