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March 16, 2020

Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620-2701

filed via ePUC

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 Mrs. Whitney:

In light of the unprecedented events occurring at this time related to COVID-19, and the short-term economic disruption created by these challenges for our customers and the state, Green Mountain Power (“GMP”) writes to request that the Commission delay implementation of the adjustors that are the subject of this proceeding for one quarter, to July 1, 2020. We will watch this situation unfold and advise whether further collection delay appears needed well prior to that time.

On February 12, 2020, GMP submitted tariffs reflecting the following adjustments under GMP’s Multi-Year Regulation Plan (“MYRP”), and prior regulation plans, which were proposed to into effect April 1, 2020. These adjustments were detailed in GMP’s January 30, 2020 letter to the Commission in this matter and include:

- Power Supply and Retail Revenue Adjustor under the MYRP for Q1 FY2020 (\$711,000);
- Exogenous Major Storm Adjustor under the MYRP for Q1 FY2020 (\$4,694,823);
- Net Power Adjustors from previous regulation plans (\$1,260,020 total).

In addition to these adjustments, as of March 31, 2020 customers will no longer pay previously-authorized Power Supply and Exogenous Adjustors ending and rolling off customer bills (amounting to a total -\$1,300,000 downward adjustment, through both a base rate change and power supply adjustment change, as detailed in our tariff filing). No change to this expiring collection is proposed here.

On March 13, 2020, the Department of Public Service (“Department”) filed comments indicating its agreement that the proposed tariffs were properly calculated and could go into effect. However, given rapidly evolving events since then, GMP and the Department have

discussed delaying the upward adjustments for the benefit of customers. GMP asks that collection of these adjustors be delayed until July 1, 2020. All other current adjustors on their bill as approved in the MYRP will remain the same, and meanwhile customers will see the benefit of the end of the March 31, 2020 adjustor collection period on their next bill cycle.

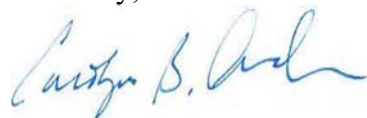
GMP is fully engaged on the COVID-19 response, with a focus to keep customers and employees safe, and to continue to deliver reliable service during these unprecedented times. There is no doubt that customers' lives will be disrupted by these events, and for some that will include financial hardship. We want to do our part to ease that by delaying these quarterly adjustments; for the same reason, we have temporarily suspended disconnects and collections activity. This situation is dynamic, and GMP stands ready to respond as it evolves.

We will provide updates if further adjustment or delay appears needed as this situation unfolds. GMP also will report results of the Power Supply and Retail Revenue Adjustor and the Exogenous Major Storm Adjustor for the second quarter of Fiscal Year 2020 on April 30, 2020. With two weeks left in the second quarter, these two adjustors are still at this point holding more favorably for customers, and GMP therefore hopes customers will be best served by waiting an additional quarter and implementing these adjustments on or after July 2020. However, the impacts of this situation are fluid, and we will carefully monitor not only power supply costs but also expected retail revenue declines during the remainder of this and next quarter as we assess how best to proceed for our customers.

As noted above, GMP has discussed this proposed delay with the Department. GMP understands that the Department will file a response to this proposal promptly and GMP will continue to work with the Department on collective efforts to stem these impacts in light of the extraordinary circumstances customers are facing due to COVID-19.

If the Commission agrees to this approach, we can submit updated tariff sheets to reflect these changes promptly and message our customers on bills accordingly. Thank you, and if you have any questions, please feel free to contact me.

Sincerely,



Carolyn Browne Anderson
CBA