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June 7, 2010

BY ELECTRONIC MAIL

Mrs. Susan M. Hudson, Clerk
Vermont Public Service Board
Chittenden Bank Building, Fourth Floor
112 State Street
Montpelier, Vermont 05620

Re: Board Rule 5.500 – Reply Comments on Draft Model Documents

Dear Mrs. Hudson:

Please consider this filing the reply comments of the Vermont Department of Public Service (the "Department") with respect to the draft Model Documents of PSB Rule 5.500. The Department has one reply comment and three general comments on the Model Documents.

* If the Board adopts a term of years for a Generation Interconnection Agreement, the Department requests that the Board use the same language as contained in the ISO-NE Standard Small Generator Interconnection Agreement.

* Throughout the Model Documents, the term "Vermont Utility" should be replaced with "Interconnecting Utility" to be consistent with the term used in the Rule.

* In Attachment B (Generator Data) to the Feasibility Study Agreement, many of the symbols for the requested generator data are incorrect. The Department does not provide all of the correct symbols in today's comments, but can work with the Board, utilities, and other stakeholders to ensure that the symbols are correct.

* The System Impact Study Agreement contains a reference to Attachment B (Generator Data), but there is no Attachment B to that model document. Perhaps Attachment B should be a stand-alone document for submitting generator data, because the Rule allows for skipping the Feasibility Study and proceeding directly to the System Impact Study.

Thank you for the opportunity to comment on the Rule 5.500 Model Documents.

Sincerely,

William B. Jordan
Electrical Engineer