

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 17-5257 INV

In re: Review of the Standard Offer Program

**COMMENTS OF ALLEARTH RENEWABLES IN RESPONSE TO
PUBLIC UTILITY COMMISSION MEMORANDUM OF NOVEMBER 28, 2018**

AllEarth Renewables, Inc. (“AER”) offers these brief comments in response to the November 28, 2018 Memorandum issued by the Vermont Public Utility Commission (“Commission”) in this matter. While the modest statutory revisions proposed by Commission staff do not address the broader exemption concerns raised by AER and others in their filings to date, the nature of the recommendations appears to constitute at least implicit rejection of the utility arguments that the Standard Offer program should end. The value of that program is evident from its history of success, and it should be statutorily expanded forthwith in size and duration in the manner suggested by AER and others, before climate change renders the discussion moot.

Thank you for this opportunity to comment.

Dated this 4th day of December, 2018.

AllEarth Renewables, Inc.

By: /s/ Nick Charyk

Nick Charyk
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