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October 2, 2020

Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05602

Filed in ePUC

Re: Proposed revisions to Vermont Public Utility Commission Rule 2
Docket Number 20-2369 RULE

Dear Mrs. Whitney:

On August 27, 2020, the Public Utility Commission (“Commission”) issued an order initiating a proceeding to review Commission Rule 2 and issued proposed changes to Rules 2.100, 2.200, 2.300 and 2.400. The Commission requested comments from stakeholders by October 2, 2020 on both the proposed changes and the process to be used for this rulemaking.

Green Mountain Power (“GMP”) appreciates the Commission’s detailed consideration of the Rule and strongly supports the Commission’s decisions to update the Rule to reflect best practices and clarify proper procedure for parties. We have conferred with firms that regularly represent us and other parties before the Commission and understand the Commission will receive their comments on the general practice issues directly through this proceeding. GMP appreciates the opportunity to provide the following additional comments regarding utility-specific proposed revisions to Rule 2.303 (Consumer Complaints) and Rule 2.402 (Rate Proceedings).

Regarding Rule 2.300, GMP finds the proposed revisions appropriate. GMP hopes to learn during this proceeding why the Commission proposes to remove from Rule 2.303 the requirement to provide a copy of a customer’s complaint to the utility. Perhaps the complaint would instead be forwarded to the utility by the Department, and the Rule could be amended to clarify that; in any case, we are interested in receiving any such complaint as promptly as possible in order to help clarify or rectify customer concerns when they arise.

For tariff proceedings, for utilities such as GMP, the Commission proposes to redact the first sentence of Rule 2.402(C) regarding suspension of the tariff and the requirements that flow from the suspension order. In this proceeding, GMP would like to discuss this proposed change

to better understand why the Commission believes that is beneficial and how that change will affect the timing and disposition of rate proceedings.

GMP agrees with the Commission that a comment and workshop process works best for a rulemaking of this nature. GMP proposes that a workshop be scheduled to discuss comments received and determine whether there is a need for additional round(s) of comments and/or workshop(s). GMP expects that this process can be efficient so that proposed changes to the Rule can move forward.

Thank you for this opportunity to comment, and we look forward to participating in this proceeding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carolyn B. Anderson".

Carolyn Browne Anderson
CBA