



FILED VIA E-PUC

October 2, 2020

Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05602

Re: Case No. 20-2369-RULE, Proposed Revisions to Vermont Public Utility Commission Rule 2

Dear Ms. Whitney:

Vermont Gas Systems, Inc. (“VGS”) submits the following initial comments regarding the Public Utility Commission’s (“Commission’s”) draft changes to Commission Rule 2, in response to the Commission’s August 27, 2020 order opening this proceeding. VGS appreciates the opportunity to participate in discussions regarding revision of the Rule.

In particular, VGS is interested in commenting on and learning more about the Commission’s proposed changes to the following sections:

- Rule 2.209: VGS would like to understand and discuss the changes to the intervention rule. The revisions appear to relax the standard for intervention. Given that interventions may, in some cases, increase costs to both litigants and Vermont customers more broadly, VGS is interested in discussing the proposed revisions to this part of the rule.
- Rule 2.216(C): VGS would like to understand and discuss the changes to the deadline to object to admissibility of prefiled testimony. It notes that the current rule provides predictability, whereas the proposed rule could present practical difficulties, particularly in proceedings with a longer schedule.
- Rule 2.303: With respect to changes to the consumer complaint process as set forth in the draft rule, VGS would like to understand the reason for striking the part of the rule that requires the Commission to share with the utility any consumer complaints. VGS would like to be apprised, through whatever process is appropriate, of any consumer complaints so that it can address them promptly.
- Rule 2.408: VGS would like to understand more about the Commission’s emergency action powers in this context. In particular, VGS might recommend that revisions be made to 2.408(C) to require notice to the other parties as soon as reasonably possible and to 2.408(F) to state that opportunity for objections and further proceedings be scheduled at the earliest possible time.

Thank you for the opportunity to participate in this matter. VGS looks forward to continued participation in this process.

Sincerely,

/s/ Jill Pfenning

Jill Pfenning
VP, Regulatory Affairs & General Counsel