

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 20-2369-RULE

Proposed Revisions to Vermont Public Utility
Commission Rule 2

ADDITIONAL COMMENTS OF ALLEARTH RENEWABLES, INC.

AllEarth Renewables, Inc. (“AER”) offers these additional comments pursuant to the November 12, 2020 order of the Vermont Public Utility Commission (“Commission”) in this matter.

The large number of comments received in response to the Commission’s initial order of August 27, 2020, and the diversity of opinions in those comments, underscores the benefits of a workshop process in understanding the Commission’s intent behind a number of the potential changes as well the parties’ positions with respect to them. Given the number of issues and participants, AER respectfully suggests that the December 18th workshop proceed under a clearly structured agenda, perhaps beginning with an overview by Commission staff of the goals and intentions underlying each of the revisions, except those that may be ministerial. Additional workshops and filings could then proceed on a more granular level.

While AER will not repeat its earlier comments here, and expects its positions to evolve as the process goes forward, AER does wish to reiterate the extent of its concern with the proposed *ex parte* communication language in Section 2.201(E)(2) of the Commission’s draft. Many of the other parties’ comments have raised concerns about this section as well, noting a variety of issues that warrant full discussion and consideration by the Commission. AER also reiterates its support for the page limits and discovery limits set out in the Commission’s draft rule. That filings made with the Commission have historically at times been long does not mean that they have to be long in order to address issues and advance positions, as state and federal courts have realized in amending civil procedural rules in recent decades.

Thank you for this opportunity to comment, and AER looks forward to the upcoming workshop.

Dated this 3rd day of December, 2020.

AllEarth Renewables, Inc.

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