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VIA ePUC

December 4, 2020

Ms. Judith C. Whitney, Clerk
VERMONT PUBLIC UTILITY COMMISSION
People's United Bank Building, 4th Floor
112 State Street
Montpelier, VT 05620-2701

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

Dear Judy,

On behalf of Sheehey Furlong & Behm P.C., I submit the following response to the thoughtful comments filed by other participants regarding the Public Utility Commission's ("Commission") proposed changes to PUC Rule 2. We appreciate the opportunity to participate in further discussions regarding the many important issues raised by commenters.

Rule 2.204(E)(4) - Several commenters move to change the current 4:30 p.m. filing deadline to 11:59 p.m. and Vermonters for a Clean Environment advocates for retaining the deadline to ensure that the Commission staff are available during business hours to assist public participants with ePUC. We agree that the Commission's staff is very helpful with the administration of ePUC and support retaining the deadline of 4:30 p.m., especially if it helps facilitate public participation in the process. We also note that ePUC handles many kinds of filings, and often, significant amounts of substantive information that are not typical of standard civil filings. Accordingly, we find that filing during normal business hours is more practical because it allows coordination between our office and the Commission's staff regarding administrative or technical matters should they arise. We would recommend further discussion of this issue before making any change to current filing deadlines.

Sincerely,

SHEEHEY FURLONG & BEHM P.C.

/s/ Owen J. McClain

Owen J. McClain

OJM/ams