

December 4, 2020

William J. Dodge
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Via ePUC

Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: PUC Case No. 20-2369-RULE

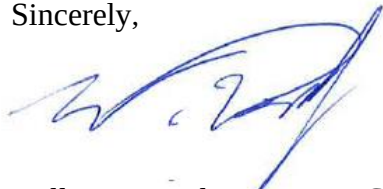
DRM Comments to Participant Comments, Re: Proposed Changes to Rule 2

Dear Judy:

The Commission has requested that participants respond to each other's comments. Since DRM's submission dated 10/13/2020 largely responds to comments of others already, we add only that we support and agree with the comments of Renewable Energy Vermont dated 10/16/2020 (ePUC [435764/151626](#)) regarding the need for the Rule to adhere to and respect longstanding constitutional tenets of standing for individuals and organizations seeking to participate in Commission proceedings.

We look forward to participating at the December 18, 2020 rulemaking conference, and thank the Commission for convening this rulemaking proceeding.

Sincerely,



William J. Dodge, Practice Group Chair, DRM Regulated Entities Group

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