

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 21-1107-PET

Petition of GlobalFoundries U.S. 2 LLC
requesting a certificate of public good,
pursuant to 30 V.S.A.. § 231, to operate a
Self-Managed Utility

Case No. 21-1109-PET

Petition of Green Mountain Power
Corporation for approval to modify service
territory

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RENEWABLE ENERGY VERMONT MOTION TO INTERVENE

NOW COMES Renewable Energy Vermont (“REV”) and pursuant to Vermont Public Utility Commission (“Commission” or “PUC”) Rule 2.209(B), moves to intervene in the above-captioned proceeding. Grounds for this motion are as follows:

1. Commission Rule 2.209(B) governs permissive intervention in Commission proceedings, and provides:

(B) Permissive intervention. Upon timely application, a person may, in the discretion of the Commission, be permitted to intervene in any proceeding when the applicant demonstrates a substantial interest which may be affected by the outcome of the proceeding. In exercising its discretion in this paragraph, the Commission shall consider (1) whether the applicant's interest will be adequately protected by other parties; (2) whether alternative means exist by which the applicant's interest can be protected; and (3) whether intervention will unduly delay the proceeding or prejudice the interests of existing parties or of the public.
2. REV meets the above-standards for permissive intervention in this proceeding and REV’s motion is timely within the Commission’s procedural order.
3. REV meets the test for intervention as of right under Commission Rule 2.209(A), under which such intervention is mandated in one of three circumstances:

(1) when a statute confers an unconditional right to intervene; (2) when a statute confers a conditional right to intervene and the condition or conditions are satisfied; or (3) when the applicant demonstrates a substantial interest which may

be adversely affected by the outcome of the proceeding, where the proceeding affords the exclusive means by which the applicant can protect that interest and where the applicant's interest is not adequately represented by existing parties.

4. REV has a substantial interest in this proceeding which may be affected by the outcome of the proceeding. A non-profit trade organization, REV's membership includes businesses, non-profits, and utility customers committed to eliminating reliance on fossil fuels by increasing resilient renewable energy and energy efficiency in Vermont. REV's members provide and receive renewable energy services, including renewable electricity generation, energy storage, renewable heating, electric vehicles and associated charging infrastructure, and more in Vermont. These innovative energy services and benefits are impacted by the issues that will be discussed in this proceeding. A direct and ongoing relationship between the composition of the state's electric utilities and the renewable energy services provided in Vermont and by REV members exists. REV frequently testifies before the legislature and participates in Commission proceedings regarding energy and climate issues. REV has a substantial interest in ensuring that current and future Green Mountain Power customers, Global Foundries, as well as current and future REV members and customers' choices and progress toward the State total renewable energy and greenhouse gas pollution reduction commitments are advanced and not adversely impacted by proposals, positions or actions taken in this docket.
5. REV regularly participates in proceedings before the Commission on behalf of its membership and has been granted intervenor status regularly.
6. The interests of REV are not adequately protected by other parties to this proceeding. The Department of Public Service ("DPS") represents the general interests of the public. REV's members have different and unique interests that sometimes differ from those of DPS.
7. REV's participation will not unduly delay the proceeding or prejudice the interests of existing parties or of the public.

Dated at Montpelier, Vermont, this 30 day of April, 2021.

Renewable Energy Vermont



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