

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-0861-RULE

Proposed revisions to Vermont Public Utility Commission Rule 5.400	
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Order entered: 07/12/2021

ORDER RE RESPONSE TO COMMENTS AND NOTICE OF WORKSHOP

I. INTRODUCTION

On February 9, 2021, the Vermont Public Utility Commission (“Commission”) issued an order opening a rulemaking to begin a review of Commission Rule 5.400. The order included a draft of the changes to Rule 5.400 that are being proposed by the Commission and set a deadline for comments on the proposed changes.

By the March 8, 2021, comment deadline, the Commission had received comments from approximately a dozen participants, some quite extensive. The Commission issued a request for response comments to be filed by April 23, 2021. Responses were filed by five participants.

Some of the comments question the Commission’s authority to implement several of the proposed changes, while others expressed concerns about the potential for increased costs or complexity that might result from some of the proposed changes. Other comments recommend changes to the Commission’s proposed revisions that are intended to clarify and simplify the filing process under Section 248. Several commenters recommend that the Commission clarify the basis of its authority to make certain changes and issue a new version of the proposed rule before moving forward with this process.

Today’s order is organized into two broad topic areas. First, we respond to questions about the basis of the Commission’s authority to make some of the proposed changes. Second, we respond to specific comments about individual sections of the proposed rule amendments and acknowledge several of the concerns expressed by some participants. Additionally, we are issuing a revised draft of proposed amendments to Rule 5.400 along with this order.

We are also scheduling the first workshop on the proposed amendments to Rule 5.400 and seek comments on the draft changes accompanying today’s order to be filed in advance of

the workshop. An agenda for the workshop will be issued after we receive comments on the newly revised proposed amendments.

II. DISCUSSION

A. Commission Authority for the Proposed Amendments

1. Generally

Several participants raise questions about the extent of the Commission's authority to adopt certain of the proposed amendments to Rule 5.400. Each of those amendments is discussed in more detail below. However, we discuss our authority generally because we believe that some of the comments reflect an overly narrow view of the Commission's authority to adopt the proposed amendments.

Participants who question the Commission's authority to adopt some of the proposed amendments contend that the Commission's authority is constrained by the text of 30 V.S.A. § 248. We disagree for three reasons. First, the Commission is directed by 3 V.S.A. § 831(d) to adopt rules of procedure for contested cases that are subject to hearings. Section 248 cases fall into this category, and Rule 5.400 is a rule of procedure. Second, 30 V.S.A. § 2(c) states that the Commission may initiate rulemaking proceedings on any matter within its jurisdiction. Third, Section 248 itself requires an ultimate determination by the Commission that a proposed project will promote the general good of the State. Accordingly, amendments to Rule 5.400 that advance that determination are not only allowed by the text of Section 248; they are supported by its overall purpose.

2. Additional Persons and Entities Entitled to Pre-filing Notice (5.402(A))

Currently, Rule 5.402(A) requires petitioners to provide a 45-day pre-filing notice ("advance submission") to the affected municipal and regional planning commissions and to the affected municipal legislative bodies.¹ The proposed amendment expands the list of persons and entities entitled to receive pre-filing notices to include adjoining landowners, host landowner(s),

¹ Section 248 does not require the advance submission to be sent to municipal legislative bodies. For projects that consist solely of the relocation of existing transmission lines, the advance submission must be sent at least 21 days in advance of a petition being filed.

the Department of Public Service (“Department”), the Agency of Natural Resources (“ANR”), the Vermont Natural Resources Board (“NRB”) if the proposed project is located on a parcel subject to an Act 250 Land Use Permit, the Division for Historic Preservation (“DHP”), the Agency of Agriculture, Food and Markets (“AAFM”), and for petitioners that are not regulated utilities, the interconnecting utility.

Several participants contend that the Commission cannot expand the list of persons and entities entitled to receive the advance submission beyond the entities listed in Section 248(f). The Commission disagrees and views the entities listed in Section 248(f) as the starting point of the required notice, to which the Commission can add if the additions are consistent with the goal of Section 248 that projects promote the general good of the State. The Commission views the proposed additions as consistent with reaching a determination on whether a proposed project will promote the general good under Section 248(a). The additional persons and entities are all likely to have an interest in at least some projects to be reviewed under Section 248. Providing them with the advance submission will increase the possibility that potential issues can be resolved before a petition is filed and will increase the likelihood that the Commission will receive a complete record in support of its decision.

The Commission does recognize the concerns expressed by some participants regarding increased costs resulting from the need to provide additional notice copies to a greater number of recipients and from the requirement that some copies be served using certified mail. The Commission addresses these concerns in its discussion on specific rule sections, below.

3. Proposed Amendments Relating to Act 250 (multiple sections)

The draft amendments require that certain information be provided in the event a proposed project that is subject to review under Section 248 would be sited on a parcel of land that is subject to an existing Act 250 permit. Specifically, if a proposed project’s host parcel is subject to an Act 250 permit, the proposed amended rule would require:

- 5.402(A)(6) Pre-filing notice to the Natural Resources Board;
- 5.402(C)(2)(d) Pre-filing notice to include Act 250 permit number;
- 5.403(A)(7) Petition to include approved Act 250 site plan;
- 5.403(A)(10) Petition to include statement of consistency with Act 250 permit, or explanation of inconsistency.

Some participants who challenge the Commission's authority to include the above proposed amendments focus on the exemption provided for Section 248 projects from the requirements of Act 250. Others characterize the proposed amendments as the Commission attempting to "enforce" Act 250 permits, noting that the Commission is without authority to do so. Still others question the relevance of the required Act 250 information in a Section 248 proceeding not only because Section 248 projects are exempt from Act 250 review, but also because Section 248 makes no mention of Act 250.

The Commission believes that these challenges to its authority to include the proposed amendments are based on a misunderstanding of the intent and effect of the challenged provisions. The Commission is not attempting to enforce existing Act 250 permits or to bring Section 248 projects under the jurisdiction of Act 250. Section 248 projects are statutorily exempt from review under Act 250.² However, the filing of an application for a Section 248 project to be sited on a parcel of land that is subject to an Act 250 permit does not exempt that parcel of land from that Act 250 permit. Thus, understanding how a Section 248 project might interact with an existing Act 250 permit would help inform the Commission's determination of whether a project would promote the general good of the State.

What commenters challenging the Commission's authority to adopt these provisions do not address is the applicability of an existing Act 250 permit to a host parcel even if an exempt Section 248 project is proposed to be placed on that parcel. If the Commission approves a Section 248 project on a parcel that is subject to an Act 250 permit, and the project results in a substantial or material change to the development authorized under the Act 250 permit, the owner of the host parcel could find itself subject to an Act 250 enforcement action or need to seek an amendment to the Act 250 permit. Bringing this relevant information into the review process at the outset will not only help advance the Commission's statutory directive to ensure that Section 248 projects promote the general good; it may also alleviate the need for collateral enforcement actions or corrective measures after the issuance of a CPG.

² 10 V.S.A. § 6001(3)(D)(ii).

4. Expiration of the 45-day Pre-filing Notice (5.402(D))

Several commenters question the Commission's authority to place an expiration date on an advance submission. The imposition of an expiration date would require the issuance of a new advance submission in the event a petition is not filed before the specified deadline.

The Commission proposed to amend section 5.402(D) so that if a petitioner fails to file a complete petition for its project within 180 days of the issuance of the advance submission, the advance submission is deemed withdrawn and the petitioner must then again comply with all pre-filing notice requirements before filing a petition.

Commenters questioning this proposed amendment contend that the Commission has no authority to place an expiration date on advance submissions because Section 248 only requires that notices be given at least 45 days before a petition is filed and therefore grants the Commission no authority to create a deadline.

The Commission disagrees that it is without authority to adopt a reasonable timeframe in which a project petition must be filed after the advance submission is issued. As noted above, the Commission is directed by 3 V.S.A. § 831(d) to adopt rules of procedure for contested cases. The advance submission requirement is a procedural requirement that falls within this authority. While it is clear that the Commission cannot reduce or eliminate the statutorily required 45-day period, the Commission concludes that it has the authority to impose a reasonable timeframe in which a petition must be filed.

Statutes are not to be interpreted in a manner that leads to absurd or illogical results.³ The point of the advance submission requirement is to allow for meaningful interaction between a project proponent and the recipients of the notice before a petition is filed. Not imposing a reasonable deadline would allow an advance submission to be issued without the associated petition being filed until many years later. Under such a scenario, the individuals who received the initial notice may have been replaced by new individuals who have no notion that a project is being planned and a petition being filed.⁴ Even in the absence of a change in identity, it would

³ See, e.g., *Rhodes v. Town of Georgia*, 166 Vt. 153, 157 (1997) (“We have long held that statutes should not be construed to produce absurd or illogical consequences.”)

⁴ For example, the representatives of the entities listed in Section 248(f) might have been replaced, or, if the Commission adopts advance submission requirements for adjoining landowners, the original recipients may have transferred their real property interests and new adjoining landowners would go without notice.

be reasonable for a notice recipient to assume after some passage of time that a project proponent had dropped its plans to file a petition.

Additionally, the following provisions of Section 248(f) all anticipate that a petition will be filed not long after the expiration of the 45-day advance submission period:

- The affected planning commissions may hold a public hearing in response to a 45-day notice and have the petitioner, the Department, or both, attend the hearing.⁵
- The Department must consider the comments made and information obtained at such a hearing in making recommendations to the Commission on the application and in determining whether to retain additional personnel to assist it in the case.⁶
- The affected planning commissions may request that the Department retain experts and other personnel to assist in its review of a proposed project, and the Department may begin the process of retaining such personnel at the time the petitioner submits its proposed plans under Section 248(f).⁷
- The affected planning commissions may make recommendations to a petitioner within 40 days of the issuance of the petitioner's advance submission.⁸
- After the petition is filed, the affected planning commissions may make recommendations to the Commission by the deadline for submitting comments or testimony.⁹
- The petitioner's application must address the substantive written comments related to the criteria of Section 248(b) that are received by the petitioner within 45 days of issuing the advance submission, and the substantive oral comments related to those criteria made at a public hearing under Section 248(f)(1)(B).¹⁰

Taken together, these provisions contemplate a process that moves forward expeditiously from the issuance of the advance submission to the filing of a petition. All of these events are

⁵ Section 248(f)(1)(A).

⁶ *Id.*

⁷ Section 248(f)(1)(B).

⁸ Section 248(f)(1)(C).

⁹ Section 248(f)(1)(D).

¹⁰ Section 248(f)(2).

triggered by the issuance of the advance submission. Allowing such a notice to remain effective for an unreasonable amount of time would render many of these events stale and out of date.

Therefore, the Commission concludes that interpreting Section 248(f) to mean that the Commission cannot impose any deadline at all for the filing of a petition once an advance submission has been issued would lead to illogical consequences.

However, the Commission acknowledges the concerns expressed by some participants about the reasonableness of a 180-day deadline, especially for large or controversial projects when a petitioner is actively attempting to resolve differences with interested persons and entities before a petition is filed. The Commission has therefore made revisions to this section that are discussed below.

5. Persons and Entities Entitled to be Served with Petition or Notice of Petition (Rule 5.406)

Challenges to the Commission's authority to expand the list of persons and entities entitled to receive either the petition or notice that the petition has been filed are similar to those raised by some participants with respect to the Commission's authority to expand the list of recipients of the 45-day advance submission.

The proposed amendments add the so-called "10-mile towns" to the list of entities entitled to service of a petition for a wind project, and add adjoining landowners, host landowners, NRB, and interconnecting utilities to the list of those entitled to receive notice of any Section 248 petition.

The Commission again finds authority to expand the list of recipients in 3 V.S.A. § 831(d), which directs it to adopt rules of procedure for contested cases. Additionally, like the entities and persons discussed above in relation to advance submissions under proposed Rule 5.402(A), the Commission believes these are all entities that will have an interest in at least some Section 248 petitions to which they would be entitled to service or notice under the proposed amendments. The reasoning for adding these entities to the requirements of Rule 5.406 is thus the same.

6. Expansion of Persons and Entities Entitled to Intervene as of Right (Rule 5.408)

Challenges to the Commission's authority to expand the scope of intervention by right are based in the language of Section 248 that specifically lists who is entitled to intervene as of right.¹¹ That list is limited to AAFM, host town and regional planning commissions, host town legislative bodies, and in certain cases adjacent town and regional authorities.

The proposed amendments would expand intervention as of right to include the entities above plus NRB if it is entitled to notice of a petition under the proposed amendments (i.e., if there is an Act 250 permit on the host parcel), DHP, any interconnecting utility, adjoining landowners, host landowner(s), and in the case of a wind generation project, all municipal planning commissions, municipal governments, and regional planning commissions for all towns wholly or partially within a radius of a minimum of ten miles of each proposed turbine.

According to those objecting, the list in Section 248 sets the outer limits on who can intervene as of right and the Commission is therefore without authority to expand the list. Expanding the list, they argue, deprives them of their right to oppose intervention by those in the newly proposed list.

The Commission believes that it has the authority to expand the list to the identified persons and entities for three reasons.

First, the Commission is required to establish rules of procedure for its contested case matters, and rules on intervention are considered procedural rules in civil courts.¹²

Second, the ultimate finding required by the Commission in a Section 248 case is whether a proposed project promotes the general good. Providing a less complex avenue for presumptively interested persons and entities to make their concerns known as parties, rather than as public commenters, is consistent with this goal and will assist the Commission in making the correct finding.

Third, the Vermont Supreme Court has determined that Article III standing is "not the relevant standard" in deciding intervention motions in Section 248 cases. Rather, intervention

¹¹ ANR is a required party in Section 248 cases. 30 V.S.A. § 248(a)(4)(E). AAFM is a required party in cases where a proposed generation facility is in excess of 500 kW and will be sited on land containing primary agricultural soils and has the right to intervene in all other Section 248 cases. 30 V.S.A. § 248(a)(4)(F).

¹² See, e.g. V.R.C.P. 24.

requests in Section 248 cases are examined under the Commission's rules, which it must apply "in pursuit of its mandate under 30 V.S.A. § 248 to ensure that the purchase and construction of new gas and electric facilities serve the general good of the State." In so doing, the Commission is not presiding over a case or controversy but is "engaged in a legislative, policy-making process" that requires it to use its "informed judgment." In performing this task, the Commission therefore has the "flexibility to decide whose presence as a party would productively inform its policy-making."¹³

As a result, the Commission believes it has the authority to reasonably expand the right to intervene in Section 248 cases. Based on the Commission's experience, the newly identified persons and entities have in certain cases adequately expressed some direct interest in the outcome of a Section 248 proceeding. Therefore, adding them to the list is a reasonable use of that authority. Additionally, the Commission notes that well-conceived Section 248 projects rarely result in significant requests for party status under the current intervention rules. Therefore, as a practical matter the proposed amendments should have little effect on most cases. However, in larger and more controversial cases, the proposed amendments serve the interests of all involved by lessening the burdens associated with disputes over requests to intervene submitted by persons or entities with clear, direct interests in the outcome of a given proceeding.

The Commission acknowledges that some commenters raised concerns beyond the question of the Commission's authority, such as the potential for increased costs and opportunities for parties to unduly delay proceedings. The Commission addresses those concerns in its discussion on specific rule sections, below, and expects them to be further explored at the upcoming workshop.

B. Response to Comments on Specific Rule Sections

In this section, the Commission will focus on responding to the comments on the sections of the proposed rule that received the most extensive comments. The absence of a response to comments on a section of the proposed rule does not necessarily mean that the Commission has completed consideration of such comments or decided whether to accept or reject them. Where the Commission has agreed with comments to rule sections that are not specifically addressed

¹³ *In re Petition of Green Mountain Power Corp.*, 2018 VT 97, ¶ 23

here, changes to the proposed amendments have been incorporated into the draft rule attached to this order.

1. 5.401: Purpose and Applicability

Some commenters recommend that the exemption from the rule for petitions filed under Section 248(j) be retained. One commenter suggests that the rule be made more specific with respect to what is required under Section 248(j), such as including standards for what constitutes a project of limited size and scope and specificity as to notice requirements for 248(j)s, noting that the rule's notice requirements differ from what is required by 248(j).

We decline to retain the exemption from the rule for 248(j) petitions. Recent amendments to the requirements for evidentiary hearings for full Section 248 petitions have brought the full 248 process closer to the process envisioned in 248(j) — that is, evidentiary hearings are only required in specified circumstances. Therefore, the distinction between subsection (j)'s expedited process and many routine Section 248 petitions has become less meaningful. We therefore are not persuaded that 248(j) petitions should be exempt from the rule.

With respect to differences in the notice requirements between the rule and Section 248(j), those differences also became less meaningful when legislative amendments to the notice requirements of Section 248(j) took effect on July 1, 2021.

Lastly, the Commission does not believe it is practical to set standards for what projects would meet the “limited size and scope” requirement of Section 248(j). Such determinations are too fact-specific to lend themselves to the setting of rule-based standards. For example, a project in one setting may not qualify for 248(j) because it is so out of context or in conflict with the existing setting, while in another location that same project would not give rise to any issues under Section 248 and could reasonably be treated as a project of limited size and scope.

2. 5.402(A), (B) & (C): Recipients Entitled to Advance Submission, Method of Service, and Contents of Advance Submissions

Several commenters express concerns over the potential for increased costs resulting from the proposed amendments to this section. Those concerns stem primarily from the expansion of persons and entities entitled to receive the advance submission and the costs of

reproducing the entire advance submission package and of serving the newly identified recipients.

The Commission acknowledges these cost-based concerns and has revised the draft proposed rule by modifying the method of service provisions in 5.402(B) and the content requirements in 5.402(C).

One commenter proposes that minor projects, such as work performed on an existing substation entirely within the existing fence, be required to provide only a 21-day advance submission.

While the Commission understands the intent behind this recommendation, it cannot be implemented. Section 248 requires a 45-day advance submission for all projects except the relocation of existing transmission facilities, which by statute are allowed to provide 21-day advance submissions. Given the statute's requirements, the Commission is without authority to adopt this recommendation.

Some commenters inquire about alternatives to using the certified grand list for identifying adjoining landowners that are entitled to receive notice. The Commission needs more information to better understand the various options for identifying adjoining landowners. Participants should therefore be prepared to discuss this issue at the upcoming workshop.

Several commenters express concerns over the potential difficulty and costs associated with the Act 250-related requirements found in 5.402(A)(6) and (C)(2)(d). They express concerns over the difficulty and costs associated with identifying and locating applicable Act 250 permits, asserting the lack of a centralized database for the permits. Some comments specifically point to concerns associated with large transmission projects that can cross many parcels of land or cross a small portion of a much larger parcel that might be subject to an Act 250 permit that does not affect the area where the line would cross. One commenter suggests adding a "good faith efforts" standard for attempting to find permits.

The Commission acknowledges these concerns and will need more information from the participants, including NRB, on the mechanics of identifying parcels of land that are subject to Act 250 permits and locating those permits and any associated relevant documents. The participants should be prepared to discuss these issues in detail at the upcoming workshop. It is not the Commission's intention to create an unreasonable burden on Section 248 petitioners.

However, it is the Commission's intention to craft a workable mechanism that ensures that it has the information needed to make a fully informed decision when a Section 248 project is proposed for a land parcel that is subject to an Act 250 permit.

One commenter objects to Rule 5.402(C)(2)(a)'s requirement that the advance submission include property boundaries for the project site, asserting that it is only setbacks that are relevant as governed by Section 248(s). The commenter also notes that transmission line projects are constructed within easements and the developer would not necessarily have the boundary information for the entire parcel.

The Commission expects this issue to be addressed at the upcoming workshop.

3. 5.402(D): Timing of Advance Submissions

Some commenters express concern over the establishment of a 180-day deadline for a petition to be filed once the advance submission is issued, particularly in cases of large projects. One commenter suggests including a waiver provision.

The Commission acknowledges these concerns and has revised the proposed section in the attached draft.

4. 5.403: Contents of Petition

Several comments were received regarding both the preamble to this section and 5.403(A)(1) and its description of the required prefiled testimony and exhibits. The Commission has made changes to the proposed amendments in response to these comments. Specifically, the Commission has eliminated the list of specific statutory sections in the preamble because they are incorporated by the reference to the criteria of Section 248(b). This approach will avoid the need to amend the rule if the list of criteria under criterion (b)(5), or any other criterion, changes in the future. We have also added language requiring testimony and exhibits sufficient to support positive findings by the Commission on all applicable Section 248 criteria.

Several commenters raise questions about the requirements for the identification of property boundary lines in 5.403(A)(6) and (7)(b).

The Commission expects this issue to be discussed in more detail in the upcoming workshop.

Comments were received regarding the difficulty of transmission line projects complying with 5.403(A)(7)(i) (cross sections); (A)(7)(j) (latitude and longitude coordinates); (A)(7)(m) (photographs of project site); and (A)(8)(c) (elevation drawings).

The Commission expects these issues to be discussed in more detail in the upcoming workshop.

Several commenters raise concerns over the requirements of 5.403(A)(7)(l) and (10) related to Act 250 permits. The concerns largely mirror those discussed above with respect to sections 5.402(A)(6) and (C)(2)(d). Again, the Commission expects these concerns to be discussed in greater detail at the upcoming workshop.

One commenter suggests limiting the requirements of 5.403(A)(15) so that information on adjacent generation projects need only be filed with petitions for net-metering and standard-offer projects.

The Commission has revised the proposed draft so that the requirement applies only to renewable generation projects using the same fuel source. The Commission believes that further limiting the requirement to only standard-offer and net-metering projects could deprive the Commission of information necessary to a possible single-plant analysis.

Two commenters request more clarity on the requirements of 5.403(C) for design-level detail and conceptual approval.

The Commission expects these issues to be discussed in greater detail at the upcoming workshop.

5. 5.406: Service and Notice of Petition

Several comments were received regarding the requirements of 5.406(A) and (B) regarding the method for serving petitions and notices of petitions, and the content of notices of petitions.

The Commission has made several revisions after considering these comments. These revisions are contained in the attached revised draft rule. The Commission remains open to further discussion of the requirements of 5.406(A) and (B) at the upcoming workshop.

6. 5.408: Intervention by Certain Persons and Entities

Comments were received expressing concern that the proposed rule would allow intervenors obtaining party status under this section to participate in all issues in a case, even those in which they do not have a direct interest.

The Commission has revised the proposed draft in response to these concerns. The revisions are contained in the attached draft rule.

AAFM suggests that it should not be required to file a notice of intervention in cases where it is not a statutorily required party, but instead should only be required to file a notice of appearance as it does in cases where it is a statutorily required party.

AAFM is correct that it has the right to appear in Section 248 cases even when it is not required to appear by statute. However, the need to file a notice of intervention in those cases arises from filing requirements inherent in ePUC. In cases where a person or entity is a statutorily required party, ePUC will allow the filing of a notice of appearance on behalf of that party. However, when that same person or entity is not required to be a party, an act of intervention is needed to create party status in ePUC even if they have a statutory right to become a party. As a result, it is necessary for AAFM to file a notice of intervention in Section 248 cases where it decides to appear but is not required to do so by statute.

7. 5.410: Public Hearings

Several commenters suggest that the Commission adopt the practice of conducting public hearings remotely. However, Section 248(a)(4)(A) requires that public hearings, when held, be conducted in at least one county where a project is proposed to be located. Purely remote hearings may not comply with this statutory requirement.

The Commission would like to hear from participants on ways to meet the statutory requirement while still enabling remote participation.

8. 5.411 and 5.412: Substantial Changes to Projects

Two commenters request further clarification on what constitutes a substantial change under these two sections. However, both sections already contain a definition of substantial change. The Commission is open to specific suggestions on how to further clarify these sections.

Two commenters express concern over the cost of complying with the advance notice and notice requirements of 5.412.

The Commission expects that this issue will be discussed in greater detail at the upcoming workshop. The Commission understands these concerns but also is concerned with ensuring that potentially affected persons and entities receive proper notice of substantial changes proposed to a previously approved project.

9. **5.413: Costs of Section 248 Projects**

Two commenters express concerns over the timing requirements of this section. The Commission believes that those concerns would be best addressed after a discussion at the upcoming workshop. Therefore, the attached revised draft does not yet contain any changes in response to those comments.

III. NOTICE OF WORKSHOP

Commission staff will host a workshop addressing the contents of the revised proposed amendments to Commission Rule 5.400 on **September 2, 2021**. The workshop will be held remotely using GoToMeeting and will begin at **9:30 A.M.** and continue through 3:30 P.M., with regular breaks throughout.

Commission staff will issue an agenda for the workshop after reviewing the comments filed on the attached draft rule. If it is not possible to cover all topics in one workshop, it will be necessary to schedule a second workshop before proceeding to the next phase of this rulemaking.

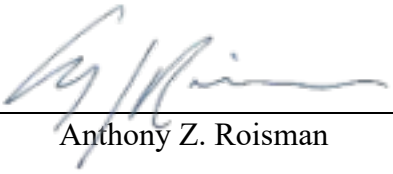
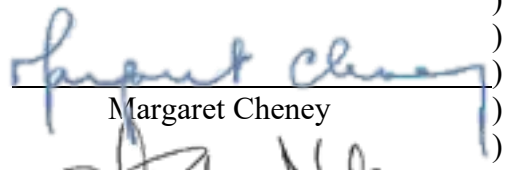
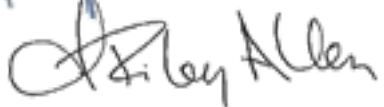
Participants and members of the public may access the workshop online at <https://global.gotomeeting.com/join/466741861>, or call in using the following information: Phone Number: +1 (646) 749-3129; Access Code: 466-741-861. Participants may wish to download the GoToMeeting software application in advance of the workshop at <https://global.gotomeeting.com/install/466741861>. Guidance on how to join the meeting and system requirements may be found at <https://www.gotomeeting.com/meeting/online-meeting-support>.

IV. COMMENTS

Participants are requested to file comments on the attached revised draft rule no later than close of business on August 9, 2021. Receiving participant comments in advance of the workshop will assist Commission staff in developing an efficient workshop agenda.

SO ORDERED.

Dated at Montpelier, Vermont, this 12th day of July, 2021.

	)	
Anthony Z. Roisman	)	PUBLIC UTILITY
	)	
	)	COMMISSION
Margaret Cheney	)	
	)	
	)	OF VERMONT
J. Riley Allen	)	

OFFICE OF THE CLERK

Filed: July 12, 2021

Attest: 
Deputy Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

PUC Case No. 21-0861-RULE - SERVICE LIST

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