
August 27, 2021

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602

Re: Case 19-0855-Rule
Proposed revisions to Vermont Public Utility Commission Rule 5.100

Dear Ms. Anderson:

AllEarth Renewables, Inc. (“AER”) offers these brief comments relative to the discussions at the July 27, 2021 workshop in this case. As AER has noted in other matters, grid modernization must be looked at holistically, and not through a series of fees that discourage renewable energy generation at a time when the climate crisis mandates that the move to an electrified, renewably powered society must happen now.¹ AER acknowledges the regulatory challenges that the Commission and stakeholders face in this realm, as grid constraint and grid condition issues may typically arise in the course of individual proceedings, but believes strongly that we must make our best collective efforts at looking at the big picture now.

AER also requests that, at the conclusion of the workshop process in this case, the Commission provide the parties with an opportunity to offer overall comments, including to propose alternative draft versions of Rule 5.100. While the division of this case into workshops covering specific topics has proven helpful and is essential for management of logistics given the length and scope of the current rule, the information gleaned and ideas exchanged during the workshop process will likely inform how each stakeholder looks at Rule as a whole.

¹ See Case No. 19-0441-TF (TGFOV Tariff Filing of Green Mountain Power), AER Comments on Memorandum of Understanding.

Thank you for this opportunity to comment.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

David Mullett, General Counsel

AllEarth Renewables, Inc.

94 Harvest Lane, Suite 100

Williston, VT 05495

802-872-9600

dmullett@allearthrenewables.com

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