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September 17, 2021

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05602

Filed in ePUC

Re: Proposed revisions to Vermont Public Utility Commission Rule 2
Docket Number 20-2369 RULE

Dear Ms. Anderson:

In a Procedural Order dated August 12, 2021, the Public Utility Commission (“Commission”) requested comments on the revised Rule 2 by September 17, 2021. Green Mountain Power (“GMP”) appreciates the thoughtful comments submitted in this proceeding and the extensive work done by the Commission to update the Rule.

GMP suggests that further refinement of Rule 2, consistent with previous comments we, counsel we regularly use in Commission proceedings, and other utilities have made, would be beneficial. By way of example, we previously commented that reference to the Vermont Rules of Civil Procedure (“VRCP”) and the well-established case law interpreting its rules is quite useful and efficient. Given the precedential and efficiency benefits of referencing the VRCP, we believe that the Commission and participants in Commission proceedings are better served by continuing to reference the VRCP.

Thank you for this opportunity to comment, and we look forward to continued participation in this proceeding.

Sincerely,

Carolyn Browne Anderson
CBA