

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 20-2369-RULE

Proposed Revisions to Vermont Public Utility
Commission Rule 2

COMMENTS OF ALLEARTH RENEWABLES, INC.

AllEarth Renewables, Inc. (“AER”) offers these comments pursuant to the August 12, 2021 *Procedural Order Publishing Latest Proposed Changes to Rule 2 and Requesting Comments* in this matter. AER appreciates the degree and quality of work reflected in the latest draft of Rule 2 and in the Hearing Officer’s explanations set forth in the August 12th Order. AER will not reiterate the points set forth in its previous comments.

1. *Another workshop would likely be beneficial.* The length of the new draft version of Rule 2 and the degree of change it embodies are such that collective review and discussion by all stakeholders may illuminate issues that individual parties may miss or not fully consider. AER does not believe a multiple workshop process is necessary given the extent of the proceedings to date, but a single and well-structured workshop would likely be helpful.

2. *The provisions of draft Rule 2.103 Commission’s regarding future amendments should be carefully reviewed.* These provisions appear to allow “amendment by order” if the Commission decides that future changes to the Vermont Rules of Civil Procedure should make their way into the Commission’s rules. While Vermont’s administrative rulemaking process is cumbersome and poses challenges when rapid change may be desired, it is not clear to AER whether this part of proposed Rule 2.103 is consistent with rulemaking requirements. Further discussion, or perhaps a sharing of the Commission’s analysis on this point, would be helpful.

3. *Rule 2.401 should include a provision for indexed and searchable tariffs on utility websites.* Over the last several months, AER has had occasion to review utility tariffs as posted on each utility’s website. In many instances, these tariffs are vestiges of the decades old practice of filing replacement sheets, which results in a confusing mix of page numbers, dates and even type fonts. Moreover, the tariffs are often rolled into a single, unindexed pdf. As tariffs such as net metering ones become more pertinent to utility customers and the public at large, it makes sense that the Commission’s procedural rule require at a minimum that tariffs be available in indexed, searchable form on each regulated utility’s website. While AER apologizes for not having identified this issue earlier, it respectfully submits that inclusion of such a provision should not be controversial and would be of significant benefit.

Thank you for this opportunity to comment.

Dated this 17th day of September, 2021.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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