

EXHIBIT

B

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

|                                                 |   |                      |
|-------------------------------------------------|---|----------------------|
| Petition of GLOBALFOUNDRIES U.S. 2 LLC          | ) |                      |
| for a Certificate of Public Good pursuant to 30 | ) |                      |
| V.S.A. § 231 to operate a Self-Managed Utility. | ) | Case No. 21-1107-PET |
|                                                 | ) |                      |

|                                              |   |                      |
|----------------------------------------------|---|----------------------|
| Petition of Green Mountain Power Corporation | ) |                      |
| for approval to modify service territory     | ) |                      |
| pursuant to 30 V.S.A. § 249                  | ) | Case No. 21-1109-PET |
|                                              | ) |                      |

**AFFIDAVIT OF JUSTIN B. BARNARD IN REGARD TO THE  
CONSERVATION LAW FOUNDATION'S MOTION TO COMPEL**

I, Justin B. Barnard, being duly sworn, depose and say:

1. I am an attorney with Dinse P.C., counsel for GLOBALFOUNDRIES U.S. 2 LLC. I make the statements in this affidavit based on my personal knowledge and swear and attest that they are true and accurate.

2. GLOBALFOUNDRIES served its responses to the Conservation Law Foundation, Inc.'s ("CLF") Initial Requests to Admit, Interrogatories, and Requests to Produce to GLOBALFOUNDRIES U.S. 2 LLC on June 11, 2021.

3. On June 25, two weeks after GLOBALFOUNDRIES served its responses, Chase Whiting, counsel for CLF, contacted counsel for GLOBALFOUNDRIES to ask for a time to confer regarding discovery issues.

4. On June 29, 2021, at our request, Attorney Whiting sent a letter identifying the issues CLF wished to discuss.

5. On June 30, 2021, my colleague Shapleigh Smith, Attorney Whiting, and I held a conference call to walk through the issues identified in Attorney Whiting's letter, including those that are the subject of CLF's present Motion to Compel.

6. I followed up on our June 30, 2021 conference and confirmed GLOBALFOUNDRIES' positions in writing on July 14, 2021. A copy of my letter is submitted as Exhibit A to GLOBALFOUNDRIES' Opposition to CLF's Motion to Compel.

7. On August 26, 2021 Attorney Whiting sent a letter (following up on a call with Attorney Smith on August 24) reiterating many of CLF's prior requests and effectively ignoring the fact that GLOBALFOUNDRIES had already provided its position on those requests.

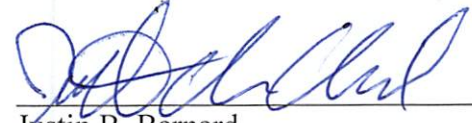
8. Attorney Whiting sent an email to me and Attorney Smith on September 7, 2021 with a request for another meet-and-confer. We agreed to convene another telephone conference on September 8, 2021.

9. In our September 8, 2021 call, we went over the same issues discussed previously and reiterated GLOBALFOUNDRIES' position on each, consistent with what was communicated in June and July.

10. In CLF's Motion to Compel, Attorney Whiting has indicated that, in the course of the parties' September 8, 2021 call, he "understood GF's counsel to say that electricity is one of several costs, including mortgage costs and other costs, that GF rolls up into the overall rent it charges IBM, Marvell, New England Federal Credit Union, and Garnet EMS."

11. Neither I nor Attorney Smith recall making the above statement, nor is it accurate. What we do recall is discussing the fact that electricity is one of a number of general, facility-wide costs (including property taxes, etc.) that rent helps defray; however, we emphasized that electricity usage is not calculated or factored into the rent for the above tenants in any specific way, given that it is not metered and GLOBALFOUNDRIES has no way of knowing how much electricity is utilized by each tenant.

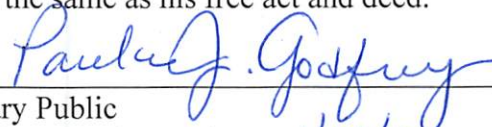
Subscribed and sworn to under the pains and penalties of perjury this 22nd day of  
September, 2021.

  
Justin B. Barnard

STATE OF VERMONT  
CHITTENDEN COUNTY, SS.

At Burlington, in said County, on this 22nd day of September 2021, before me personally  
appeared Justin Barnard, to me known to be the person described in, and who executed the  
foregoing, and he acknowledged that he executed the same as his free act and deed.

Before me,

  
Notary Public  
My Commission expires 1/31/23

Paula J. Godfrey  
Notary Public  
State of Vermont  
Commission Number: 0002156  
Commission Expires: 01/31/23