

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 21-1107-PET

Petition of GlobalFoundries U.S. 2 LLC requesting
a certificate of public good, pursuant to 30 V.S.A. § 231,
to operate a Self-Managed Utility

Case No. 21-1109-PET

Petition of Green Mountain Power Corporation for
approval to modify service territory pursuant to
30 V.S.A. § 249

**RESPONSE OF ALLEARTH RENEWABLES, INC. TO
CONSERVATION LAW FOUNDATION’S MOTION TO COMPEL**

AllEarth Renewables, Inc. supports granting of the relief requested in *Conservation Law Foundation’s Motion to Compel GlobalFoundries U.S. 2 LLC to Respond to Initial Discovery Requests* (“the CLF Motion”) filed on September 17, 2021. The CLF Motion accurately notes the breadth of what is discoverable under the applicable Vermont Rules of Civil Procedure, the discovery requests at issue appear to be reasonably tailored and proportional to the needs of the case, and it is especially important that full discovery be had here given the unique nature of what Petitioner Global Foundries seeks and the prospective ramifications of allowing it.

Dated this 24th day of September, 2021.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

David Mullett, General Counsel
AllEarth Renewables, Inc.
94 Harvest Lane
Williston, VT 05495
802-872-9600
dmullett@allearthrenewables.com

This document has been filed via ePUC