

**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

REPLY TO SCHEDULING PROPOSAL OF DEPARTMENT OF PUBLIC SERVICE

AllEarth Renewables, Inc. (“AER”) has reviewed the schedule proposed by the Department of Public Service (“Department”),¹ and objects to it for the reasons set forth in AER’s initial Motion to Amend and its reply to the responses of other parties to that motion. In resolving these scheduling issues, AER respectfully requests that the Commission remain mindful that the timing of the Petitions in these cases was uniquely in the control of the respective Petitioners, who have had years of dealings with one another, were fully aware of the pending expiration of the current special contract between them, and aware of the timing of the upcoming GMP rate filings noted by the Department in proposing the schedule it would like to see here. A schedule premised on evidentiary hearings before jurisdiction is resolved, and which reduces the discovery period on an environmentally significant MOU to about the length of time a utility has to object to a net metering registration, does not well serve the Commission, the remaining parties to these cases, or the citizens of Vermont.

Dated this 30th day of September, 2021.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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¹ The Department’s filing accurately reflects that AER was not among the parties consulted prior to that filing.