

**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 OF ALLEARTH RENEWABLES, INC. TO
DEPARTMENT OF PUBLIC SERVICE AND AGENCY OF NATURAL
RESOURCE'S JOINT MOTION TO AMEND SCHEDULE**

While AllEarth Renewables, Inc. (“AER”) disagrees with Petitioners regarding many aspects of these cases, it recognizes the importance of moving the cases to resolution in a timely manner, consistent with the rights of the parties and the public interest in a full exploration of the issues. The parties to the Letter of Intent have had months to share data and discuss a prospective Memorandum of Understanding with one another, and it is appropriate for the Commission to set a firm and prompt deadline around those efforts. In recognition of the reality that the initial deadlines under the existing schedule are imminent, however, AER believes an extension of two weeks of all current dates and deadlines, rather than the month that has been requested, would strike a reasonable balance between the competing interests.

Dated this 13th day of October, 2021.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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