

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 19-0855-RULE

Proposed revisions to Vermont Public Utility
Commission Rule 5.100

COMMENTS OF ALLEARTH RENEWABLES, INC.

AllEarth Renewables, Inc. (“AER”) appreciates the presentations offered at the September workshop, and agrees with the need to expand and simplify the net metering program as expressed in several of those presentations. Consistent with its prior comments over the course of these proceedings, AER submits that among the key components of the next iteration of Rule 5.100 are that it (1) maintains a nexus between net metering rates and utility residential rates, and in a manner that encourages robust growth of net metering; (2) simplifies the program in every way reasonably possible; (3) eliminates the 500kW customer cap; and (4) requires that utility billing systems and net metering-related tariff filings meet minimum and uniform standards. AER looks forward to working with the Commission and other stakeholders to fashion a rule that meets these objectives, and to the Commission’s outlining of the next procedural steps and overall comment opportunities.

Thank you for the Commission’s consideration of these comments.

Dated this 15th day of October, 2021.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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