

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 21-4060-PET

Petition of Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company (both d/b/a “Consolidated Communications”) for approval of a Successor (2022-2024) Incentive Regulation Plan, pursuant to 30 V.S.A. § 226b	
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**CONSOLIDATED COMMUNICATIONS’ MOTION TO EXTEND, IF NEEDED,
THE CURRENT INCENTIVE REGULATION PLAN UNTIL AN ORDER APPROVING
A SUCCESSOR PLAN IS ISSUED**

Pursuant to Section I(B) of the current Incentive Regulation Plan (“Plan”), Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company (both d/b/a “Consolidated Communications” hereafter, “Consolidated”) respectfully move the Public Utility Commission (“Commission”) to issue an order further extending the term of the Plan approved in Docket No. 8337¹ until the Commission approves a successor incentive regulation plan (“IRP”) in the above-captioned case. In support of this Motion, Consolidated states as follows:

1. Pursuant to the Commission’s December 3, 2020 Order Granting Extension of the Incentive Regulation Plan in Case No. 20-2684-PET, Consolidated’s current Plan is set to expire on July 31, 2022.
2. As of June 15, 2022, the parties have submitted Initial Briefs and Reply Briefs in this Case regarding the Commission’s approval of a successor IRP and propose competing provisions that will need to be resolved by the Commission. Accordingly, Consolidated

¹ In its Order of March 18, 2016 in Docket No. 8337, the Commission approved the current Plan. *Petition of Telephone Operating Company of Vermont, LLC, d/b/a FairPoint Communications, for approval of a Successor Incentive Regulation Plan*, Docket No. 8337, Order approving Plan (Vt. Pub. Serv. Bd. March 18, 2016) (hereafter “Docket 8337”).

anticipates that the Commission will need time to take the matter under advisement, issue a proposal for decision, allow for an opportunity for the parties to comment, and issue a final decision thereafter.

3. To the extent that additional time beyond the current Plan's expiration on July 31, 2022 is required to complete this process, Consolidated moves the Commission to extend the current Plan until such time as the Commission issues a final order in this Case.

4. This Motion is consistent with the requirement under 30 V.S.A. § 226b mandating that an IRP not remain in effect longer than seven years. As noted in the Commission's December 3, 2020 Order in Case No. 20-2684-PET, the seven-year period for full statutory review of the current Plan under 30 V.S.A. § 226b "does not expire until March 18, 2023."

For the above reasons, Consolidated requests that, to the extent needed, the Commission extend the current Plan until such time as the Commission issues a final order approving a successor IRP in the above-captioned matter.

DATED at Burlington, Vermont, on this 15th day of June 2022.

Consolidated Communications of Vermont
Company, LLC and Consolidated Communications
of Northland Company

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