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July 8, 2022

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
People's United Bank Building, 4th Floor
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 21-0861-RULE, Proposed Revisions to Vermont Public Utility Commission Rule 5.400

Dear Ms. Anderson:

In response to the Commission's June 16, 2022 Order ("Order") in this matter the Vermont Electric Power Company, Inc. ("VELCO") would like to thank the Commission for its effort to improve the rules and offer the following brief comments.

With respect to the Order's Item 8 (Linear Projects) VELCO suggests that the Commission delete proposed section 5.404 (B)(2). The level of information (longitude/latitude) is more specific than the level of information VELCO typically makes public, and, given the other information and depictions that we typically provide about linear projects in Section 248 filings, respectfully does not provide any significant additional benefit to the other parties.

VELCO has previously commented in opposition to the Commission's proposed changes related to the Order's Item 10 (Intervention). VELCO continues to assert that intervention and even more particularly the scope of intervention should be determined on a case-by-case basis in order to balance interested parties' substantive individual rights, the public's interest in administrative efficiency and electric customers' interests in timely and cost-effective siting.

With respect to the Order's Item 13 (Material Deviation), VELCO adopts the position and reasoning set forth in Vermont Electric Cooperative's June 22, 2022 comments.

VELCO appreciates the opportunity to submit comments in this proceeding and looks forward to our continued participation in the rulemaking.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Mark Sciarrotta", written over a horizontal line.

S. Mark Sciarrotta
General Counsel and Sustainability Director