

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 22-2230-PET

Petition of Vermont Gas Systems, Inc., pursuant to 30 V.S.A. § 248(i), for approval of an out-of-state renewable gas purchase contract with a term exceeding five years	
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**THE DEPARTMENT OF PUBLIC SERVICE'S RESPONSE TO
CATHERINE BOCK'S MOTION FOR RECONSIDERATION**

On July 29, 2022, Catherine Bock filed a motion to intervene in this matter seeking permissive intervention under Commission Rule 2.209(B).

On August 5, 2022, Vermont Gas Systems, Inc. ("VGS") and the Department of Public Service (the "Department") filed responses to the motion. Neither VGS nor the Department objected to the motion. In its response to the motion, the Department noted that its July 5, 2022 comment recommended a comprehensive evaluation of the proposed renewable natural gas contract's impacts, including ratepayer impacts and greenhouse gas mitigation.

On August 15, 2022, the hearing officer issued an order denying Catherine Bock's motion to intervene. The hearing officer concluded that the motion did not raise a particularized interest specific to the movant and that the interests presented in the motion are protected by the Department.¹

On August 17, 2022, Catherine Bock filed a motion to reconsider (the "Motion") in response to the hearing officer's August 15, 2022 order. The hearing officer has requested that any responses to the Motion be filed by August 22, 2022.

The Motion and Catherine Bock's earlier motion to intervene misstates the Department's interest in this case. The Department is evaluating the proposed contract under the least-cost

¹ Order Denying Motion to Intervene, Case No. 22-2230-PET at 4 (Aug. 15, 2022).

integrated planning standard, pursuant to 30 V.S.A. (s) 218c, as well as the proposed contract's consistency with Vermont state energy policy, including the Vermont 2022 Comprehensive Energy Plan and the Vermont Global Warming Solutions Act. The Department does not assume the greenhouse reduction benefits associated with the proposed contract as stated by VGS to be true. To the contrary, the Department is independently verifying VGS's assertions regarding whether the proposed contract presents a cost-effective means of reducing greenhouse gas emissions and the overall impact to ratepayers to achieve those reductions.

Additionally, one of the Motion's bases for permissive intervention is grounded in a misunderstanding the purpose of the workshop held in this case. The motion asserts that the "Department's representative failed to speak at all during the workshop. . ." and that the "Department was not prepared to address [Catherine Bock's] interests." Workshops are held to allow the Commission to gather information in an informal, non-evidentiary proceeding regarding a specific topic of interest or a proposed rule or program.² The workshop in this matter was held as an informational session to assist the Commission and staff in understanding VGS's proposed contract and renewable natural gas program. The Department's participation in the workshop is in no way indicative of its review. While the Department found the information presented by VGS to be helpful in its understanding, the Department gathers information for its review and formation of testimony primarily through the formal discovery process. The Department has submitted two rounds of discovery requests on VGS in this matter. The

² The PUC defines "workshop" as "an informal Commission proceeding convened to bring stakeholders and interested members of the public together to discuss a particular topic or a proposed rule or program. Workshops are one way for the Commission to get input and facilitate discuss of issues in an uncontested case proceeding." PUC's Glossary of Terms (available at [link](#)).

Motion's reliance on the Department's participation in an informal, informational workshop as a basis for demonstrating a differing, particularized interest from the Department is misplaced.

While the Department maintains it has no objection to Catherine Bock's intervention, neither does it take issue with the hearing officer's August 15, 2022 order. Should the hearing officer affirm denial of the motion for intervention, the Department encourages Catherine Bock and other interested members of the public to submit public comments to assist the Commission and the Department in considering additional, relevant areas of concern and developing further questions at a potential evidentiary hearing.

DATED at Montpelier, Vermont this 22nd day of August 2022.

Respectfully submitted,

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc: ePUC Service List