

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of GlobalFoundries U.S. 2 LLC requesting	)	
a certificate of public good, pursuant to 30 V.S.A. § 231,	)	
for a newly created, wholly owned subsidiary of	)	Case No. 21-1107-PET
GlobalFoundries, GF Power, to operate as a public service	)	
company, under regulation appropriate to its function	)	

MOTION TO AMEND CERTIFICATE OF PUBLIC GOOD

GLOBALFOUNDRIES U.S. 2 LLC (“GlobalFoundries”) and GF Power LLC (“GF Power”), by and through Dinse P.C., hereby move the Public Utility Commission (“Commission”) pursuant to 30 V.S.A. §231(a) and V.R.C.P. 60(b) to amend the Certificate of Public Good issued in this proceeding to move the deadline for complying with Condition No. 6 from December 1, 2022 to February 1, 2023 and to move the deadline for complying with Condition No. 12. In support of their motion, GlobalFoundries and GF Power state as follows:

1. On October 21, 2022, the Commission issued a Certificate of Public Good to GF Power pursuant to 30 V.S.A. §§ 231 and 249, which required, pursuant to Condition No. 6 thereof, the following:

Before December 1, 2022, the CPG Holder shall obtain any required regulatory approvals from the Federal Energy Regulatory Commission (“FERC”) in order to participate in wholesale transactions as a Transmission Customer (if any) and will register as a market participant with ISO New England and shall file copies of these approvals in the compliance subcase of Case No. 21-1107-PET.

2. The Certificate of Public Good, required, pursuant to Condition 12 thereof, the following:

Within 30 days of the date this CPG is issued, the CPG Holder shall file this power purchase agreement with the Commission in the compliance subcase of Case No. 21-1107-PET.

3. There are no FERC approvals necessary for GF Power's operations at present.

4. GF Power is in the process of registering as a market participant with ISO New England ("ISO-NE"). GF Power registered with the Vermont Secretary of State as a public service company on November 4, 2022 and, that same day, delivered GF Power's market participant application to ISO-NE. The NEPOOL membership committee granted conditional membership to GF Power on November 14, 2022. On November 17, 2022, GF Power will meet with ISO-NE staff to review the application in an effort to expedite approval of the application. Additional meetings will be scheduled over the next two weeks as needed. However, there is a significant likelihood that ISO-NE will not be able to complete approval of GF Power's application in time to comply with Condition No. 6, given the short amount of time between issuance of the CPG and the December 1, 2022 deadline for registration.

5. GF Power believes that an additional two months will allow sufficient time to complete registration as a market participant. GF Power's goal is to complete registration as soon as possible, and hopefully by January 1, 2023.

6. Since the issuance of the CPG, GMP and GF have actively negotiated the terms of the Power Purchase Agreement ("PPA"). The parties believe that ISO-NE meetings scheduled in the coming weeks will facilitate finalization of the PPA terms with respect to transmission and for that reason ask that the deadline to file the PPA under the CPG be extended to December 5, 2022.

7. Good cause supports the request for amendment, as the timing of ISO-NE's approval is outside of GF Power's control and failure to amend could lead to a violation of the terms of the Certificate of Public Good.

8. Counsel for GlobalFoundries and GF Power has attempted to confer with counsel

for the other parties to this proceeding, and is authorized to represent that the Vermont Department of Public Service, the Vermont Agency of Commerce and Community Development, Green Mountain Power, Vermont Electric Power Company, Inc., Vermont Transco LLC, Town of Stowe Electric Department and Conservation Law Foundation, Inc. have no objection to the amendment. AllEarth Renewables Inc. takes no position on the Motion. Vermont Agency of Natural Resources, Vermont Public Power Supply Authority and Burlington Electric Department have not yet responded.

WHEREFORE, for the foregoing reasons, GlobalFoundries and GF Power respectfully request that the Commission grant their motion and amend the Certificate of Public Good to move the deadline for completing Condition No. 6 by two months, from December 1, 2022 to February 1, 2023 and Condition No. 12 by two weeks, from November 21, 2022 to December 5, 2022.

Dated at Burlington, Vermont this 15th day of November, 2022.

By /s/ Shapleigh Smith, Jr.

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