STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Investigation into the Clean Heat Standard Default Delivery Agent Costs and Quantities	))	Case No. 23-2221-INV

CONSERVATION LAW FOUNDATION'S RESPONSE TO THE VERMONT PUBLIC UTILITY COMMISSION'S REQUEST FOR COMMENTS

Conservation Law Foundation ("CLF") respectfully provides the following comments in response to the Vermont Public Utility Commission's (the "Commission") June 30, 2023, Order Opening Investigation (the "Investigation Order"), in which the Commission requested input as to (1) whether there are matters more appropriately addressed within the scope of the above captioned proceeding than in 23-2220-RULE; and (2) whether the Commission should follow contested-case-like procedures for the above captioned proceeding.[1] CLF has no comment as to the first question. As to the second question, CLF agrees with the reasoning offered by Burlington Electric Department[2] and Green Mountain Power,[3] and the conclusion reached by Stowe Electric Department[4] and AllEarth Renewables,[5] that Docket Number 23-2221-INV should be treated as a contest case.

Dated at Montpelier, Vermont, this 4th day of August 2023.

CONSERVATION LAW FOUNDATION

By: _____

Chase S. Whiting
Conservation Law Foundation
15 East State Street, Suite 4
Montpelier, VT 05602
(802) 223-5992 x. 4013
(802) 223-0060 (fax)
cwhiting@clf.org

Service made pursuant to Rule 2.204(B)(4), *via* ePUC.

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[1] *See* Investigation Order at 2-3.
[2] *See* BED Comments at 2 (July 25, 2023).
[3] *See* GMP Comments (Aug. 3, 2023).
[4] *See* SED Comments at 2 (Aug. 3, 2023).
[5] *See* AER Comments (Aug. 4, 2023).