

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-1253-INV

Public Utility Commission investigation into
the definition of single plant pursuant to Act
38 of 2025 and decommissioning financial assurances

COMMENTS OF ALLEARTH RENEWABLES, INC.

AllEarth Renewables, Inc. (“AER”) supports the proposed revisions to 30 V.S.A. §8002(18) offered by Allco Renewable Energy Inc. (“Allco”) in its July 17, 2025 filing in this case. A definition that focuses solely on the point of interconnection is clear, simple and consistent with the approach taken by ISO-New England and throughout the region. The present statutory language, with the vagaries noted by Allco, creates uncertainty for developers and other stakeholders and added work for the Commission. Moreover, the inevitable suppression of renewable energy development achieved by Federal (OBBB, Executive Order 14315, Treasury Notice 2025-42) and State (elimination of offsite net metering and winding down of Standard Offer without replacement) actions should not be further exacerbated by retention of a single plant definition and process that is ambiguous and unnecessary.

With respect to decommissioning issues, AER agrees with the concerns expressed by Renewable Energy Vermont in its July 17th filing on the subject. A significant lessening of financial burdens around decommissioning makes excellent sense given the absence of history of project abandonments, the long life of projects, and the incentive of project owners to keep their renewable energy facilities running as long as there is a reasonable revenue stream. More information will benefit all stakeholders in determining what changes are appropriate.

Thank you for this opportunity to comment.

Dated this 5th day of September, 2025

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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