

Filed via ePUC

April 30, 2020

Mrs. Judith C. Whitney
Clerk of the Commission
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Request for Comments on Potential Further Extension of Commissioning Deadlines – Case No. 20-0789-INV

Dear Commissioners,

MHG Solar agrees with the Commission's consideration of a one-year extension of all net-metering and standard-offer commissioning deadlines that fall between March 25, 2020 and December 31, 2020. It is the fair and prudent approach to a rapidly evolving and massively disruptive set of market conditions being caused by the COVID-19 pandemic and the resultant state of emergency actions and orders that have been necessary to halt its spread.

MHG Solar agrees with the Commission's observations that disruptions in supply chains and construction affect the ability of projects to achieve their commissioning deadlines. We would simply add a bit further that the impacts and delays are still largely unknown. It is not clear how long it will be (if ever) until typical construction crew sizes and deployments will be allowed. It is not clear how broadly the supply chain will be impacted. It is not certain how an increasing backlog in these critical paths (including items like utility interconnection work) will be resolved in parallel with a continued commitment to operate in a safe, conscientious manner that limits the risk to all parties while still moving solar projects forward.

One thing, however, that is clear is that all businesses and workers will need to follow additional, yet to be defined, personal and public health precautions as we all begin to manage the process of returning to work. There will necessarily be a learning curve in this process for all businesses, from gas stations to grocery stores to solar construction. Simply put, we don't know what our operations will look like when we return to work. One of the most powerful tools available to a public body like the Commission in a time of such great uncertainty is their unique ability to remove the immediate pressures of timelines that might otherwise drive hasty decisions. We can't know exactly what the future holds but extending the time to figure it out can be nothing but a good thing for all involved to allow activity to resume while still following the best available medical guidelines for worker and public safety as they evolve.

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To that end, MHG Solar strongly supports a one-year extension of all commissioning deadlines as set forth in the request for comments, as it stands as a logical way to broadly address many of the unknowable variables tied to this broad disruption.

We appreciate the Commission's foresight and actions to date on this topic and we are encouraged to see a continued willingness to adapt as the situation unfolds.

Regards,



Pete Giese
Manager

MHG Solar

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