



May 11, 2020

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

Re: Case Number 20-0789-INV – Norwich Solar Technologies Comments on Commission’s April 30, 2020 Order Requesting Comments on Potential Further Extension of Commissioning Deadlines.

Dear Commissioners:

Norwich Solar Technologies (“Norwich Solar”) is pleased to submit the following comments in response to the Vermont Public Utility Commission’s (“Commission”) April 30, 2020 Order Requesting Comments on Potential Further Extension of Commissioning Deadlines (the “Order”). Norwich Solar thanks the Commission for its recognition and consideration of the disruptions occurring in our society with respect to the COVID-19 pandemic.

As we continue to work to slow the spread of the virus in Vermont, and in recognition of the Governor’s Stay Home, Stay Safe Executive Order and Addenda, Norwich Solar is experiencing significant unpredictability in our supply chains and subsequently construction activities. There is no doubt that negative impacts and commissioning delays are resulting from the State and national economic shutdown. Volatility surrounding planning and meeting our contract commitments to commission new generation solar facilities is very challenging at this time. Unfortunately, these side effects show little indication of settling down in the near term.

Norwich Solar strongly agrees with the Commission’s proposal to grant one-year extensions of all commissioning deadlines of net-metering and standard-offer projects whose commissioning deadlines fall on or after March 25, 2020 through December 31, 2020 (i.e. a commissioning deadline of August 22, 2020 would be extended to August 21, 2021). Extending the commissioning deadlines will not only enable our workers to proceed safely and vendors to perform but will also save State staff resources to administer on a case-by-case basis.

We also ask the Commission to consider extending the dates the Commission established in its March 30, 2020 Order in this Case for waiving certain procedural requirements. The Commission’s March 30, 2020 Order temporarily waived certain requirements from March 25, 2020 to June 1, 2020 relating to notarization, viewing project plans and petitions, and certified mailings. Since a “new normal” may not be established by the June 1, 2020 date, Norwich Solar recommends extending the June 1, 2020 waiver date until September 1, 2020.

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Norwich Solar thanks the Commission for the opportunity to comment on its proposal for extending commissioning deadlines. We appreciate the Commission's foresight and actions to date and welcome the opportunity for input into keeping Vermonters safe and healthy.

Respectfully Submitted,



Martha Staskus

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