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EGGLESTON &  
CRAMER PC

ELIJAH D. EMERSON  
ADMITTED IN VT, NH, MA AND ME  
*eemerson@primmer.com*  
TEL: 802-223-2102  
FAX: 802-223-2628

100 East State Street | P.O. Box 1309 | Montpelier, VT 05601-1309

**Filed via ePUC**

May 12, 2020

Judith Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street – Drawer 20  
Montpelier, Vermont 05620-2701

Re: Case No. 20-0789-INV/Vermont Public Utility Commission orders and memoranda  
issued in response to COVI-19 pandemic

Dear Ms. Whitney:

On April 30, 2020, the Public Utility Commission (the “Commission”) issued an Order requesting comments on whether the commissioning deadline for net metering and standard offer projects should be extended for one year. This would only apply to projects that currently have a commissioning deadline between March 25, 2020, and December 31, 2020. The following are the comments of SolarSense, LLC urging the Commission to issue such a general extension:

As the Commission is well aware, the COVID-19 pandemic has upended every aspect of our lives. Though the term is well-worn at this point, it is nonetheless true: these are uncertain times. This is particularly true for solar developers that already face normal contingencies like weather and component pricing, and now have to deal with potential supply-chain issues for equipment like modules, inverters, monitoring systems, and racking. Additionally, with stay-at-home orders finally being lifted, and the potential for them to be reinstated later in the year, solar developers are concerned it would be difficult to schedule the labor needed to construct and commission their projects. This issue would be exacerbated if a project started construction and then had to stop if the State reinstated a stay-at-home order.


There is also a concern that the work of utility companies could be delayed because they also must deal with precautionary work restrictions while providing an essential service to their customers. The utility might face restrictions to the type of work it performs or it might experience labor and equipment shortages, making it impossible to physically interconnect the project. Thus, there are many good reasons the Commission should issue the extension being contemplated.

The Commission could end up inadvertently exacerbating these problems by not granting the extension because many developers will be in a rush to use scarce materials and labor in an attempt to complete projects before their original commission deadlines. With the implementation of the proposed deadline extensions, developers can, in a more cost effective manner, plan for shipment arrivals and the scheduling of the workforce. This will provide more stability to the entire industry.

Lastly, granting the extension will make the Commission's work more efficient. Without it, the Commission will likely be forced to respond to many individual requests for extensions, which could take valuable time away from focusing on important COVID-19 related efforts and other critical oversight. The pandemic and its ramifications easily meet the standard of good cause for granting an extension. Moreover, it is an event that is completely outside the control of the developers. Therefore, the Commission should grant the general extension as discussed in its April 30<sup>th</sup> Order.

Thank you for your attention to this issue.

Regards,

A handwritten signature in blue ink, appearing to read "Elijah D. Emerson". The signature is fluid and cursive, with the first name "Elijah" being the most prominent part.

Elijah D. Emerson