



May 12, 2020

Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620

Re: Extension of Commissioning Date for All Projects & COVID-19 CPG Applicant Process; Case No. 20-0789-INV

Dear Commissioners:

In recognition of the unprecedented events we are all experiencing related to the COVID-19 epidemic, Renewable Energy Vermont supports the Public Utility Commission's proposal to issue CPG commissioning deadline extensions. REV suggests at least a one-year extension of all construction and commissioning deadlines for all renewable electricity and storage projects that currently have a Certificate of Public Good issued by the Commission. We recommend this action to help forestall the inevitable deluge of individualized extension requests, and conserve resources for the Commission, relevant state and local agencies, and all parties.

Unfortunately delays and interruptions to operations are increasing every day at every point along the manufacturing, supply, development, permitting, construction, interconnection, and operation timeline. On March 18, 2020, Green Mountain Power issued a letter setting out several short-term COVID-related plans, including the immediate cessation of line work related to interconnection. Every new delay imposes ramifications for every person who operates in, regulates, and benefits from Vermont's renewable energy sector.

The Department of Public Service indicated to us in March of 2020 that it supports this extension, and we anticipate that the Department will file a recommendation in support. The Agency of Natural Resources; Agency of Agriculture, Food & Markets; Division of Historical Preservation; and Green Mountain Power authorized REV to represent that they support this request. We are aware that Commission Rule 5.110 (c) and each CPG issued contains a 1 year deadline for construction/commissioning. Further, REV supports the Commission's proposed revisions to Rule 5.100 to allow a permitted project to be constructed within two years of CPG issuance.

As part of the Commission's laudable COVID-19 operational response actions, REV also requests that the Commission treat CPG applications submitted under Rule 5.100 similarly to its treatment of other Section 248 applications in regards to adjoining landowner mailings. Specifically, we ask the Commission temporarily (for the next three months) allow applicants to receive a notification of filing, description of the project with map, and an electronic copy of the full application (CD, thumb drive, and/or website link to full application) along with an easy way for request of full printed copy of the application if needed. Rule 5.100 currently requires that applicants send a complete copy of the petition to adjoining landowners. Surprisingly, these



requirements are unique to net-metering projects and not required for much larger projects filed under Rule 5.400 or telecommunication towers filed under Section 248a.

With professional offices operating virtually to the greatest extent possible, the requirement to photocopy potentially hundreds of pages for a single CPG petition application for numerous adjoining landowners poses particular challenges to people working from home with limited resources. These voluminous copies are not required by statute. The requirement set in rule also has long had the unintentional impact of increasing the ultimate cost of local renewable electricity generation via higher permit application burden.

We appreciate the Commission's temporary waiving of certified mailings in its recent emergency Rule 2.500. As the Commission recognized, such mailings require physical trips to the post office which counters physical distancing mandates and the intent of Governor Scott's numerous Stay Home Stay Safe Orders. It appears as though a technical correction may be needed to Emergency Rule 2.504(B)(2) in regards to mailings of complete applications. The stakeholders or parties are listed in different order under Rule 5.106(F) and 5.107(E). It is suspected that the Commission aimed to require first class mail to adjoining landowners and others in Commission Rule 5.107(E)(a), (h), and (i) and ePUC notification for state agencies and others in 5.107(E)(b) through (g).

REV members are taking extra precautions to protect the safety of their workers and families amid this epidemic. REV appreciates the Commission's consideration of these comments. We look forward to working with you to mitigate the epidemic's impact on our members' customers, working Vermonters, and our local economy.

Respectfully submitted,

A handwritten signature in green ink that reads "Olivia Campbell Andersen".

Olivia Campbell Andersen
Executive Director