

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Vermont Public Utility Commission orders and) Case No. 20-0789-INV
memoranda issued in response to COVID-19)
pandemic)

**VERMONT AGENCY OF NATURAL RESOURCES COMMENTS ON
POTENTIAL FURTHER EXTENSION OF COMMISSIONING DEADLINES**

The Agency of Natural Resources (Agency) hereby submits its comments to the Vermont Public Utility Commission (Commission) in response to its Order Requesting Comments on Potential Further Extension of Commissioning Deadlines in Case No. 20-0789-INV dated April 30, 2020.

BACKGROUND

On April 30, 2020, the Commission issued an Order Requesting Comments on Potential Further Extension of Commissioning Deadlines in Case No. 20-0789-INV. Specifically the Commission has asked for comments by May 13, 2020 on whether, in light of the conditions caused by the COVID-19 pandemic, it would be appropriate to grant a one-year extension of all commissioning deadlines for net-metering and standard-offer projects whose commissioning deadlines fall on or after March 25, 2020, through December 31, 2020. The Agency now provides the following comments in response to the Order.

DISCUSSION

The Agency agrees that under the current circumstances surrounding the COVID-19 pandemic, it would be appropriate to grant a one-year extension of all commissioning deadlines for net-metering and standard-offer projects whose commissioning deadlines fall on or after March 25, 2020, through December 31, 2020. The Agency also notes that

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inherent in the activities leading up to commissioning, certain new generation facilities may be required by their Certificate of Public Good, Memorandum of Understanding (MOU) executed with the Agency, or various Commission Orders as the case may be, to undertake certain activities with respect to the 30 V.S.A. §248(b)(5) criteria. These could include but are not limited to natural resource assessments, wildlife and plant surveys, field studies and delineations, or sampling or monitoring activities. Some of these activities may have seasonal restrictions associated with conducting them, as well as specific timeframes for reporting the results, all contained within the CPG, MOU, or Order. In addition, there may be restrictions placed on the timing of certain construction activities, if for example, deer wintering yards are present.

It is the Agency's understanding that any deadlines, restrictions, or timeframes associated with those activities would remain in place, and extensions for those activities, if needed, would be addressed on a case-by-case basis. The Agency has also reviewed and supports the comments made by the Department of Public Service in this matter.

The Agency thanks the Commission for the opportunity to provide comments on this issue.

Dated May 13, 2020, at Montpelier, Vermont.

Respectfully submitted,

State of Vermont
Agency of Natural Resources

Sincerely,



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