

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 21-0018-PET

Petition of Starlink Services, LLC for designation as an Eligible Telecommunications Carrier for purposes of receiving rural digital opportunities fund support	
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Order entered: 05/03/2021

**ORDER GRANTING ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

In this Order, the Vermont Public Utility Commission (“Commission”) adopts the following proposal for decision.

**PROPOSAL FOR DECISION**

**I. INTRODUCTION**

This case involves a petition filed with the Commission by Starlink Services, LLC (“Starlink”), seeking designation as an eligible telecommunications carrier (“ETC”) in Vermont for the purpose of receiving federal funding as a successful bidder in the Rural Digital Opportunity Fund (“RDOF”) Phase I Auction (“Auction 904”). Auction 904 will provide up to \$16 billion to connect high-speed broadband networks to census blocks that only have access to broadband at speeds of 25/3 Mbps or less.<sup>1</sup>

In today’s Order, I recommend that the Commission grant Starlink’s petition and designate Starlink as an ETC in the census blocks where it has been awarded Auction 904 funding.

**II. PROCEDURAL HISTORY**

On January 5, 2021, Starlink filed its ETC petition with the Commission. Starlink also filed a request for expedited consideration of its petition by the June 7, 2021, deadline set by the FCC for successful RDOF bidders to obtain ETC status.

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<sup>1</sup> *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126 et al., Report and Order, FCC 20-5, ¶¶ 2, 8-9 (Feb. 7, 2020) (“*Rural Digital Opportunity Fund Order*”).

On January 12, 2021, I requested comments on the petition and inquired whether Starlink would be filing an application for a certificate of public good (“CPG”) to provide telecommunications services in Vermont.

On February 4, 2021, Starlink filed comments stating that it filed an application for a CPG in Case No. 21-0815-TELCOCPG and responded to inquiries that it had received from the Vermont Department of Public Service (“Department”).

On February 9, 2021, the Department filed comments and prefiled testimony recommending that the Commission approve Starlink’s petition without further hearings or investigation, subject to several proposed conditions (“Department 2/9/2021 Comments”).

On February 16, 2021, I requested a response from Starlink on the Department’s comments and proposed conditions.

On March 3, 2021, Starlink filed a response to the Department’s comments (“Starlink 3/3/21 Comments”).

No party has requested an evidentiary hearing or objected to any documents filed in this proceeding. Accordingly, the following documents are admitted as if they were presented at a hearing: the petition (“Petition”) and exhibit 1; amendment to Petition (1/12/21) (“1/12/21 Amendment”); supplement to Petition (2/3/21) and attachment 1 (“2/3/21 Supplement”); affidavit from R. Edward Price (3/3/21) (“Price Affidavit”); Department 2/9/2021 Comments; and prefiled testimony of Corey Chase, Department (“Chase”) and exhibits A-C; and Starlink 3/3/21 Comments.

### **III. REQUIREMENTS FOR DESIGNATION AS AN ETC**

Section 254(e) of the Telecommunications Act of 1934, as amended (the “Telecommunications Act”), provides that “only an eligible telecommunications carrier designated under section 214(e) of this title shall be eligible to receive specific Federal universal service support.”<sup>2</sup> Accordingly, before a “telecommunications carrier”<sup>3</sup> may receive federal universal service support, it must first be designated as an ETC.<sup>4</sup> The Commission has the

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<sup>2</sup> 47 U.S.C. § 254(e).

<sup>3</sup> “Telecommunications carrier” is defined by 47 C.F.R. § 54.5.

<sup>4</sup> 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(a)(1); *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021*, Public Notice, AU Docket No. 20-34 et al., 35 FCC Rcd 13888 (Dec. 7, 2020) (“*Auction 904 Winning Bidders Public Notice*”), at 13900-13901.

authority under the Telecommunications Act to designate ETCs in Vermont. The Telecommunications Act and its implementing regulations prescribe standards for ETC designations.<sup>5</sup>

A carrier seeking designation as an ETC must show that it offers “voice telephony service,” which includes four supported services: (1) voice-grade access to the public switched telephone network (“PSTN”) or its functional equivalent; (2) minutes of use for local service provided at no additional charge to end users; (3) access to emergency services; and (4) toll limitation services to qualifying low-income consumers.<sup>6</sup> The ETC also must advertise the availability of and charges for these services using media of general distribution.<sup>7</sup>

ETCs must provide their services, at least in part, using their own facilities and may not offer services exclusively through the resale of another carrier’s services.<sup>8</sup> Prior to designating a telecommunications carrier as an ETC, the Commission also must find that such designation is in the public interest.<sup>9</sup> In a 2005 order, the FCC encouraged states to follow the same analytical framework followed by the FCC when reviewing ETC applications to ensure that designations were in the public interest.<sup>10</sup> The FCC also encouraged state commissions to require ETC applicants to provide additional information with their ETC petitions, including a five-year plan for the use of high-cost universal support, a demonstration of the applicant’s ability to remain functional in emergency situations, and a demonstration that the applicant will satisfy consumer protection and service quality standards.<sup>11</sup> The FCC also strengthened the annual reporting requirements applicable to ETCs.<sup>12</sup>

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<sup>5</sup> The standards are found generally in 47 C.F.R. § 54.101, *et seq.*

<sup>6</sup> 47 C.F.R. §§ 54.101(a) and (b).

<sup>7</sup> 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)(2).

<sup>8</sup> 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(i).

<sup>9</sup> 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(c).

<sup>10</sup> *See In the Matter of Federal-State Joint Commission on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) at ¶¶ 41-61 (“*Guidelines Order*”).

<sup>11</sup> *Guidelines Order* at ¶¶ 2, 4; 47 C.F.R. § 202(a).

<sup>12</sup> The annual reporting requirements are codified at 47 C.F.R. § 54.313, and are applicable to recipients of high-cost fund support. Annual reporting requirements for carriers receiving only Lifeline support are codified at 47 C.F.R. § 54.422.

#### **IV. PUBLIC COMMENTS**

On February 18, 2021, Richard Pecor of Colchester, Vermont, filed a public comment in this proceeding asking the Commission to deny Starlink's request for ETC designation. Mr. Pecor explained that he has been working over the last year to obtain fiber optic service from Comcast for the 39 properties in his neighborhood. As part of the effort to connect his neighborhood, Mr. Pecor states that he has attempted to obtain funding to assist with the costs of the line extensions but has been unsuccessful.

Mr. Pecor explains that his neighborhood falls within a census block for which Starlink has been awarded Auction 904 funding. As a result, his neighborhood will be identified as having broadband Internet access at broadband speeds of at least 25/3 Mbps, which will preclude his neighborhood from receiving future funding to assist with line extensions. Mr. Pecor states that Starlink's system could result in all locations in Vermont being identified by the FCC as having 25/3 Mbps broadband speeds. Mr. Pecor asks the Commission to closely review the technical capabilities of Starlink's service due to its limited historical performance data.

#### **V. POSITIONS OF THE PARTIES**

The Department states in its comments that it has reviewed Starlink's petition and has analyzed the census blocks in which Starlink will be required to build voice and broadband service under the RDOF program. The Department recommends that the Commission grant Starlink's request for designation as an ETC in the census blocks identified in Starlink's petition, subject to certain requirements to allow for adequate State oversight of Starlink's ETC obligations, including: (1) filing with the Commission and the Department all deployment milestone reports filed with the FCC; (2) filing with the Commission and the Department a marketing plan within 60 days that describes the marketing efforts that Starlink will use to advertise the availability of required services; and (3) filing with the Department and the Commission an annual certification describing Starlink's marketing efforts during the year. Starlink states that it does not object to the Department's proposed conditions.

Because the parties agree on the Department's proposed conditions, I recommend that the Commission include the conditions in any order that issues designating Starlink as an ETC.

## VI. FINDINGS

### A. Company Background

1. Starlink is a Delaware limited liability company with a principal office located at 1 Rocket Road, Hawthorne, California 90250. Petition at 2; Price Affidavit.
2. Starlink is a wholly-owned subsidiary of Space Exploration Technologies Corporation, (“SpaceX”), which is also headquartered at 1 Rocket Road, Hawthorne, California 90250. Petition at 2; Price Affidavit.
3. SpaceX designs, manufactures, and launches rockets, spacecraft, and satellites. Petition at 2; Price Affidavit.
4. The FCC has authorized SpaceX to deploy and operate approximately 4,400 non-geostationary orbit satellites in low-Earth orbit. Petition at 3-4; Price Affidavit.
5. SpaceX is beta testing consumer broadband using its Starlink system in Washington, Montana, Minnesota, Oregon, Michigan, Idaho, Wisconsin, Maine, and North Dakota. Petition at 4; Price Affidavit.
6. Starlink’s satellites connect customer premises equipment (e.g., satellite antennas) with terrestrial SpaceX gateways using the Internet protocol. The SpaceX gateways are connected by fiber to Internet points of presence. Starlink will have a gateway site located in Lunenburg, Vermont. Petition at 6-8; Price Affidavit; 2/3/21 Supplement.
7. Starlink is authorized to do business in the state of Vermont and has applied for a CPG to provide telecommunications services in Case No. 21-0815-TELCOCPG. Petition at 2; Price Affidavit; 1/12/21 Amendment; 2/3/21 Supplement.
8. SpaceX was selected as a winning bidder in 323 census blocks in Vermont in Auction 904 and assigned its winning bids to Starlink. Starlink is expected to provide voice and broadband service to approximately 2,247 unserved locations across all 14 counties in Vermont. Petition at 1; exh. 1 to Petition; Price Affidavit; Chase pf. at 5, 6; Chase exh. A.
9. Starlink was awarded support at the “Above Baseline” performance tier, which requires 100/20 Mbps speeds with 2 TB of monthly usage.<sup>13</sup> Chase exh. A.

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<sup>13</sup> *Rural Digital Opportunity Fund Order* at ¶31.

10. Starlink will operate as a common carrier in the census blocks where it will receive Auction 904 support. Petition at 9; Price Affidavit.

**B. Services Supported by Universal Service Support Mechanisms**

**1. Voice Telephony**

11. Starlink will provide voice-grade access to the PSTN using Voice Over Internet Protocol (“VoIP”) technology. Petition at 10; Price Affidavit.

12. Starlink is evaluating options for providing VoIP service, including using a managed service provider or developing its own VoIP service. Petition at 10; Price Affidavit.

13. Starlink will offer voice rate plans in the census blocks where it will receive Auction 904 support that include local calling at no additional charge and will comply with any and all minimum local usage requirements adopted by the State or FCC. Petition at 11; Price Affidavit.

14. Starlink will provide E911 access to all of its customers. Petition at 11-12; Price Affidavit.

15. Starlink will provide toll limitation services to qualifying low-income consumers in the census blocks where it will receive Auction 904 support. Petition at 11; Price Affidavit.

**2. Rural Development Opportunity Fund**

16. Starlink will offer broadband Internet access services within the census blocks where it will receive Auction 904 support consistent with applicable high-cost universal support rules. Petition at 11, 13; Price Affidavit.

17. Starlink will offer standalone voice service and will offer voice and broadband services at rates that are reasonably comparable to rates offered in urban areas. Petition at 9, 12; Price Affidavit.

18. Starlink has provided a list of the census blocks and accompanying maps showing where it has been awarded Auction 904 support. Petition at 11; exh. 1 to Petition; Price Affidavit.

19. The Department reviewed the list of census blocks where Starlink has received Auction 904 funding and confirmed that the number of locations identified for service under the

terms of Starlink's Auction 904 funding meets or exceeds the number of unserved locations based on state E911 data. Chase pf. at 5-6.

**3. Lifeline**

20. Starlink will provide Lifeline to qualifying low-income consumers and publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. Petition at 13; Price Affidavit.

**C. Facilities**

21. Starlink will offer supported services using its own facilities or a combination of its own facilities and resale of another carrier's service within the census blocks where it will receive Auction 904 support. Petition at 9; Price Affidavit.

**D. Advertising**

22. Starlink will advertise the availability and rates for its universal service offerings using media of general distribution throughout the census blocks where it will receive Auction 904 support. Petition at 13; Price Affidavit.

**E. Additional Requirements for Designation**

23. Starlink will comply with the service requirements applicable to the support that it receives, including the requirements of Auction 904. Petition at 13; Price Affidavit.

24. Starlink will remain functional in emergency situations. Starlink will have sufficient back-up power to remain functional in emergency situations and will be able to reroute traffic around damaged facilities and manage increases in traffic due to emergencies or outages. Starlink's network will allow users to communicate with multiple satellites in view and will have multiple gateway options. Starlink will also offer a 24-hour battery backup option for customer premises equipment. Petition at 14; Price Affidavit.

**Discussion**

As an entity seeking ETC designation for the purpose of receiving funds under the RDOF program, 47 C.F.R. § 54.202 requires Starlink to certify that it will comply with the service requirements applicable to the support that it receives and demonstrate that it is able to remain functional in emergency situations.

For successful Auction 904 bidders seeking ETC designations, the FCC has waived two of the requirements in Section 54.202, including the requirements that petitioners submit a five-year plan and that petitioners demonstrate that they will satisfy applicable consumer protection and service quality standards. The FCC explained that it waived these requirements because it had “adopted more specific measures to track deployment, including annual reporting of service to geocoded locations and certification of compliance with benchmark milestones” and because the “obligations were no longer essential to the Commission’s ability to monitor ETC use of support for its intended purpose.”<sup>14</sup> I recommend that the Commission waive the same requirements for applicants seeking ETC designation for the purpose of receiving Auction 904 funding in Vermont.

#### **F. Public Interest**

Prior to designating a competitive telecommunications carrier as an ETC, the Commission must determine that the designation is “consistent with the public interest, convenience, and necessity.”<sup>15</sup> In the Guidelines Order, the FCC established an analytical framework that it would use in reviewing whether ETC applications were in the public interest.<sup>16</sup> For the purpose of the RDOF auction, however, the FCC presumes that the designation of an Auction 904 winner as an ETC will serve the public interest and does not require additional evidence in petitions for ETC designations.<sup>17</sup> The Department also concluded that the additional provision of voice and broadband services to residences as a result of Starlink’s receipt of Auction 904 funds serves the public interest.<sup>18</sup>

### **VII. DISCUSSION**

Starlink is a winning bidder for Auction 904 support to provide broadband Internet service using its satellite network to 323 census blocks in Vermont.<sup>19</sup> The performance tier at

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<sup>14</sup> *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier, Public Notice*, WC Docket No. 09-197 et al., 33 FCC Rcd 6696, 6699 (July 10, 2018) (“*ETC Public Notice*”).

<sup>15</sup> 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(c).

<sup>16</sup> *Guidelines Order* at ¶¶ 41-61.

<sup>17</sup> *Auction 904 Winning Bidders Public Notice* at 13901 n. 71; *ETC Public Notice* at 6700-6701.

<sup>18</sup> Chase pf. at 6.

<sup>19</sup> Petition at 1; exh. 1 to Petition; Price Affidavit.



which Starlink was awarded support requires Starlink to provide service at 100/20 Mbps speeds with 2 TB of monthly usage.

#### New Technology

The Department and Mr. Pecor have noted that Starlink's satellite service involves a new technology with a limited performance history.<sup>20</sup> As a winning bidder, however, Starlink will be required to demonstrate its qualifications through the FCC's long-form application process, which includes certifying that it is financially and technically capable of providing the service for which it has been awarded support.<sup>21</sup> As part of the certification, Starlink must provide a description of the technology that it will use to provide the required voice and broadband service certified by a professional engineer.<sup>22</sup>

Starlink also will be subject to certain buildout and reporting requirements during the construction of its network in addition to the reporting requirements associated with offering the Lifeline services.<sup>23</sup> Under the RDOF program, Starlink must offer service to 40% of the awarded locations in Vermont by the end of the third calendar year after funding is authorized, and complete 20% each following year, subject to adjustments for changes in the service location counts.<sup>24</sup> If Starlink fails to meet its service milestones, Starlink will be subject to non-compliance measures under a penalty framework established by the FCC.<sup>25</sup> Starlink and the Department have agreed that Starlink will provide its milestone reports to the Department.

Although Starlink will use a novel technology to provide voice and broadband Internet service to unserved locations, I recommend that the Commission approve Starlink's petition for designation as an ETC. Under the terms of the RDOF program, Starlink will be required to provide broadband connectivity to approximately 2,247 unserved locations in Vermont. Starlink's coverage will also benefit areas outside of Starlink's RDOF census blocks by providing an additional broadband Internet option. Any effect on future broadband funding that may result from Starlink's service will be because broadband Internet service has been made available to previously unserved locations. The annual progress and performance reports

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<sup>20</sup> Chase pf. at 7; Comments of Richard Pecor at 2.

<sup>21</sup> *Rural Digital Opportunity Fund Order* at ¶¶ 86-113.

<sup>22</sup> *Id.* at ¶¶ 90.

<sup>23</sup> *Id.* at ¶¶ 45-53; 47 C.F.R. § 54.422.

<sup>24</sup> *Id.* at 45-53.

<sup>25</sup> *Id.* at ¶¶ 58-64.

provided to the State and the FCC under the requirements of this order and the RDOF program will allow ample oversight to ensure that Starlink is meeting obligations as an ETC in Vermont and an RDOF participant.

#### Duration of ETC Designation

The Commission has historically designated ETCs in service areas in Vermont for limited periods, requiring renewal of an ETC's designation every couple of years. I have not recommended here a limited duration for ETC status for several reasons. First, as discussed above, Starlink is subject to the FCC's buildout and milestone reporting requirements for a period of up to eight years and must retain its ETC designation and provide the supported services throughout this time to continue to qualify for the support that it has been awarded.<sup>26</sup> Second, ordering paragraph number eight below requires Starlink to notify the Commission within 30 days if it is no longer providing the services described in any of its submissions to the Commission. Third, under 47 U.S.C. § 214(e)(4), Starlink must obtain the Commission's permission to relinquish its ETC designation and stop providing the supported services. Finally, as a recipient of high-cost support, Starlink will be subject to 47 C.F.R. § 54.313 and will be required to annually certify to the Commission that it is an eligible telecommunications carrier and continues to be eligible to receive federal universal service funds.<sup>27</sup>

### **VIII. CONCLUSION**

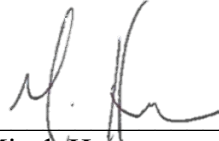
Based on the findings and discussions above, I recommend that the Commission conclude that Starlink's petition satisfies the requirements for designation as an ETC in the census blocks where it will receive Auction 904 funding, subject to the conditions agreed to by the Department and Starlink.

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<sup>26</sup> *Rural Digital Opportunity Fund Order* at ¶¶ 45-52; 47 C.F.R. § 54.802(c).

<sup>27</sup> *See, e.g., 2020 Universal Service Program Certification for Eligible Telecommunications Carriers pursuant to 47 C.F.R. §§ 54.313-54.314 Investigation*, Case No. 20-2497-INV.

This Proposal for Decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because it is not adverse to any party.

A handwritten signature in black ink, appearing to read "M. Howe", is positioned above a horizontal line.

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Micah Howe  
Hearing Officer

**ORDER**

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission of the State of Vermont (“Commission”) that:

1. The findings of fact and conclusions of the Hearing Officer are adopted.
2. The Commission designates Starlink Services, LLC (the “Company”) an Eligible Telecommunications Carrier (“ETC”) under 47 U.S.C. § 214(e), with a service area corresponding to the census blocks for which it receives support from the Rural Development Opportunity Fund (“RDOF”), as listed in Exhibit 1 to the Company’s petition in this case (“RDOF Census Blocks”).
3. The Company’s request for expedited consideration is granted.
4. The Commission designates the Company as an ETC subject to the following conditions proposed by the Vermont Department of Public Service (“Department”) and the Company:
  - a. In a format to be agreed on by the Company and the Department, the Company shall file with the Commission and the Department any and all deployment milestone reports filed with the Federal Communications Commission (“FCC”) during the period that it is receiving RDOF support, including the number of locations served with stand-alone voice in the applicable RDOF Census Blocks.
  - b. Within 60 days of this order, the Company shall file a marketing plan that describes the marketing and outreach efforts that the Company will use in advertising the availability of the required services, and explain how those efforts will be effective in reaching eligible consumers. Specifically, the marketing plan shall describe:
    - i. whether information about the required services is clearly displayed on the Company’s website;
    - ii. the Company’s use of multiple outreach methods;
    - iii. the frequency of the Company’s outreach efforts;
    - iv. whether the Company will provide outreach materials to relevant community institutions;
    - v. whether the Company will advertise in multiple languages, if appropriate;

- vi. the Company's use of clear and plain language when describing the required services; and
  - vii. possible cooperation between the Company and other ETCs for the joint production, placement, and use of outreach materials.
- c. The Company shall file with the Commission and the Department by June 30 of the year following the Company's initiation of service in the RDOF Census Blocks, and each year thereafter, an annual certification describing its outreach efforts for the preceding year.
- d. All filings required by this ordering clause shall be filed in the compliance subcase of this case.

5. The Company shall file with the Universal Service Administrative Company the information required by 47 C.F.R. § 54.401(d).

6. The Commission retains continuing jurisdiction to review, modify, or revoke its designation of the Company as an ETC or to alter or amend the service area in all manners allowed to it under state and federal law. This jurisdiction may be exercised on petition or at the discretion of the Commission, in circumstances including but not limited to the alteration of the requirements for ETCs by the FCC.

7. Non-Compliance. The Department or the Commission may at any time provide to the Company a written Notice of Possible Non-Compliance relating to one or more of the ETC Requirements. In that event, the Company shall within 30 days certify in writing to the Commission, and deliver a copy to the Department, that it continues to satisfy each of the ETC Requirements identified in the Notice of Possible Non-Compliance ("Claim of Continued Compliance"). The Commission may revoke the Company's designation as an ETC or order such other remedies as the Commission deems appropriate if either of the following occurs:

- a. The Company fails to file a Claim of Continued Compliance; or
- b. The Commission determines, after opportunity for hearing, that the Company has not demonstrated that it continues to satisfy each of the ETC requirements identified in the Notice of Possible Non-Compliance.
- c. During the pendency of any proceedings under this paragraph, the current designation order shall remain in effect.


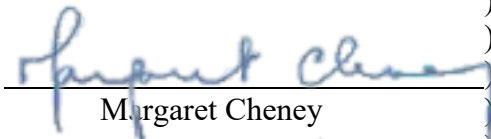
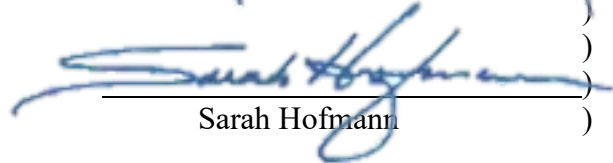
8. Additional Filings and Obligations. The Company shall:

- a. Comply with all applicable federal and state laws and regulations governing the administration of the Lifeline program, including the filing of all annual reports required by Part 54 of the FCC's rules.
- b. Abide by Commission Rules 7.607, 7.608, 7.610, 7.618, and 7.619, to the extent those rules are applicable to it.
- c. Participate in Vermont quarterly Lifeline Committee meetings.
- d. Refrain from seeking any support from Vermont's Universal Service Fund. In the event the Company decides to seek funds from the Vermont Universal Service Fund, it shall apply to the Commission for additional authorization.

9. The Company shall provide notice to the Commission and the Department within 30 days if information it previously submitted with respect to its provision of the supported services or its advertising for those services is no longer correct.

10. The preceding conditions may be modified by subsequently adopted and generally applicable administrative rules.

Dated at Montpelier, Vermont, this 3rd day of May, 2021.

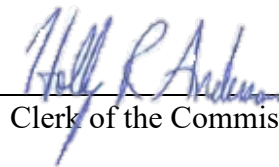
 _____ )	) PUBLIC UTILITY
Anthony Z. Roisman )	
 _____ )	) COMMISSION
Margaret Cheney )	
 _____ )	) OF VERMONT
Sarah Hofmann )	

OFFICE OF THE CLERK

May 3, 2021

Filed:

Attest:

  
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Clerk of the Commission

*Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov))*

*Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.*

PUC Case No. 21-0018-PET - SERVICE LIST

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