

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of GlobalFoundries U.S. 2 LLC requesting )  
a certificate of public good, pursuant to 30 V.S.A. § 231, ) Case No. 21-1107-PET  
to operate a Self-Managed Utility )

Petition of Green Mountain Power Corporation for )  
approval to modify service territory pursuant to ) Case No. 21-1109-PET  
30 V.S.A. § 249 )

**CONSERVATION LAW FOUNDATION’S REQUEST TO REVISE SURREBUTTAL  
DISCOVERY DEADLINES, WHICH DPS HAS CONSENTED TO**

Conservation Law Foundation (“CLF”) respectfully requests that the Public Utility Commission (the “Commission”) extend deadlines for surrebuttal discovery such that requests be served on the Department of Public Services (“DPS”) by October 1, 2021, and responses be due by October 11, 2021. Those dates would align with the revised schedule for Commission Information Requests. *See* Order of September 27, 2021.

There is good cause to revise the surrebuttal discovery schedule. *See* V.R.C.P. 6(b). CLF believes that the proposed revised surrebuttal discovery deadline will provide adequate and reasonable time to draft discovery requests to account for GF’s fourth supplemental discovery response and production, which CLF received via ePUC at approximately 1:00 PM today (Sept. 27, 2021), while the undersigned was in a meeting and unable to review the materials. CLF has not had adequate or reasonable opportunity to review those newly disclosed materials (many of which appear to be weeks or even months old) in advance of tomorrow’s deadline. Based on an initial cursory review, it appears materials disclosed today pertain to work done by DPS in relation to the Letter of Intent and Schedule A, which were first filed by GF in response to Q.CLF.GF.13 on the afternoon of September 22, 2021. Those matters are of great significance to these Proceedings, and CLF hopes to address them adequately in surrebuttal discovery. Good cause thus exists to revise that surrebuttal discovery schedule.

Attorney Dan Burke informed the undersigned that DPS has no objection to this Request. Given the tight timeline, the undersigned did not reach out to other parties to seek their consent. The undersigned did so because this Request primarily impacts CLF and DPS and time was of the essence to file the Request. The undersigned apologizes to the Commission that this Request was filed after 4:30 PM. The undersigned acted as quickly as possible after receiving GF’s fourth supplemental production.

Dated at Burlington, Vermont, this 27th day of September 2021.



By:

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Chase S. Whiting, Staff Attorney  
Conservation Law Foundation  
15 East State Street, Suite 4  
Montpelier, VT 05602  
(802) 223-5992 x. 4013  
(802) 223-0060 (fax)  
[cwhiting@clf.org](mailto:cwhiting@clf.org)

cc: Service list via ePUC