

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 21-1107-PET

Petition of GlobalFoundries U.S. 2 LLC requesting  
a certificate of public good, pursuant to 30 V.S.A. § 231,  
to operate a Self-Managed Utility

Case No. 21-1109-PET

Petition of Green Mountain Power Corporation for  
approval to modify service territory pursuant to  
30 V.S.A. § 249

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**RESPONSE OF ALLEARTH RENEWABLES, INC. TO AGENCY OF  
NATURAL RESOURCES MOTION TO INTERVENE**

On September 23, 2021, the Agency of Natural Resources (“ANR”) filed a Motion to Intervene in these cases. In that Motion, ANR recognizes the appropriateness of some extension of the schedule, and notes that, while it does not plan to engage in discovery, it does seek “only to provide prefiled testimony on the limited issues” described in its filing.” *ANR Motion at 3*. Those “limited issues” involve such things as the potential impacts of allowing the state’s largest customer to become its own electric utility, the relationship of that step to ANR’s statutory responsibilities to track and report emissions, and how all of this would fit with ANR’s role “[a]s the state’s lead environmental agency, tasked with implementing many of the requirements of the Global Warming Solutions Act and having jurisdiction over the emissions of air contaminants, generally.” While AER and ANR may not agree on the adjective used by the latter to describe these issues, they do appear to agree that they should be the subject of testimony and evidence that is not possible to fit within the existing schedule. Given this, AER does not object to ANR’s intervention, provided that allowing it is coupled with a restructuring of the schedule as requested in AER’s *Reply to Responses re: Motion to Amend Schedule* that is also being filed today.

Dated this 28th day of September, 2021.

AllEarth Renewables, Inc.

By: /s/ *David Mullett*

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