

**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

MOTION TO DISMISS

AllEarth Renewables, Inc. moves pursuant to V.R.C.P. 12(b)(1) and (6) that Case No. 21-1107-PET be dismissed for lack of subject matter jurisdiction and for failure to state a claim upon which relief can be granted, and that Case. No. 21-1109-PET then be dismissed in that it is rendered moot by dismissal of Case No. 21-1107-PET. A brief in support of this motion, and in response to the issues raised in the Commission's Order of September 30, 2021, is filed herewith.

Dated this 8th day of November, 2021.

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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