



January 17, 2022

Ms. Holly Anderson, Clerk  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620

Re: Extension of 2022 Commissioning Dates; Case No. 20-0789-INV

Dear Commissioners:

In recognition of continued supply chain disruptions and rapidly increasing COVID-19 case numbers, Renewable Energy Vermont (REV) requests that the Public Utility Commission grant a one-year extension of all commissioning deadlines for net-metering and standard-offer projects whose commissioning deadlines fall on or after January 1, 2022, through December 31, 2022. We recommend this action to help forestall a wave of individualized extension requests and to conserve resources for the Commission, relevant state and local agencies, and all parties.

As the Commission recognized in prior Orders issued in the Case extending commissioning deadlines for net-metering and standard-offer projects, COVID-19 has had profoundly disrupted supply chains and construction activities. Unfortunately, delays and interruptions to operations continue to adversely impact the manufacturing, supply, development, permitting, construction, interconnection, and operation timelines. COVID-19 cases are at the highest levels ever in both Vermont and around the globe largely due to the highly contagious Omicron variant.<sup>1</sup> High case counts continue to impact the labor force and the availability of workers. The continuing impact of COVID on global supply chains has been widely reported and is especially severe for the solar industry. Bloomberg, for example, reports that solar supply chain issues may not be resolved until the end of 2022.<sup>2</sup>

The baseline 1-year commissioning deadline is short under normal circumstances and yet more difficult to meet in the face of the profound impacts of COVID. We believe that this request will help mitigate the epidemic's ongoing impact on our members' customers, working Vermonters, and our local economy. REV members are taking extra precautions to protect the safety of their workers and families amid this epidemic. REV appreciates the Commission's proactive efforts to address these challenges over the past two years and consideration of these comments.

Sincerely,

Jonathan Dowds

A handwritten signature in black ink that reads "Jonathan Dowds".

Deputy Director  
Renewable Energy Vermont

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<sup>1</sup> New York Times, Coronavirus Map and Cases. <https://www.nytimes.com/interactive/2021/us/covid-cases.html>

<sup>2</sup> Bloomberg, Solar's Growth Stumbles Just as the World Needs It Most. <https://www.bloomberg.com/news/articles/2021-10-25/solar-energy-growth-rate-slows-with-supply-chain-shortages-rising-panel-prices>