

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 20-0789- INV

Vermont Public Utility Commission orders and memoranda issued in response to COVID-19 pandemic

MOTION FOR EXTENSION OF COMMISSIONING DEADLINES

AllEarth Renewables, Inc. (“AER”) moves that the Commission grant a one-year extension of all commissioning deadlines for both net metering and standard offer projects for which the current commission deadline falls at any point within calendar year 2022.

Renewable Energy Vermont (“REV”) has filed a similar request in the form of a public comment on January 17, 2022, and AER’s motion makes the same request on a more formal basis.¹ The REV request effectively articulates the need for the requested extension. As a Vermont manufacturer and installer of dual-axis solar trackers and other products, AER is experiencing first-hand the supply chain disruptions and other impacts brought about by the cumulative effects of the ongoing pandemic and most recently the Omnicron variant. These factors have also impacted Vermont’s electric utilities; AER is observing up to two months of utility delay in interconnecting even small new solar projects to the grid. As the REV filing notes, it appears increasingly unlikely that supply chain related issues will be resolved soon, and Vermont’s short and unpredictable construction season effectively reduces a calendar year to nine usable months at best, at a time when the climate crisis requires, and Vermont’s Global Warming Solutions Act mandates, that the state’s renewable energy programs not be undermined by the COVID pandemic.

Dated this 19th day of January 2022.

AllEarth Renewables, Inc.

By: /s/ *David Mullett*

David Mullett, General Counsel
AllEarth Renewables, Inc.
94 Harvest Lane, Suite 100
Williston, VT 05495
802-872-9600
dmullett@allearthrenewables.com

This document filed via ePUC

¹ While AER is aware that the Commission has structured this case as an uncontested one, with filings made as public comments, it respectfully submits that a formal schedule for eliciting comments and responses around the AER and REV extension requests will facilitate expeditious and full consideration of the requests.