



VIA EPUC

February 7, 2022

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

**RE: ORDER REQUESTING COMMENTS ON REQUESTS TO EXTEND COMMISSIONING DEADLINES**

Mrs. Commissioners:

Green Peak Solar, LLC (“GPS”) appreciates the opportunity to submit comments on Renewable Energy Vermont (“REV”) and AllEarth Renewables, Inc. (“AER”) requests for an extension of the commissioning deadlines for standard-offer and net metering projects.

The COVID-19 pandemic has had significant effect on construction activities in Vermont. Reduced production early in the pandemic due to restrictions on in-person gatherings here in the United States and around the world has caused scarcity in raw materials (such as steel and copper), and delays in manufacturing for many essential components. For example, the lead time for racking has nearly doubled from 10-12 weeks prior to the pandemic to 22-23 weeks. Similarly, lead times for reclosers have extended from 16 weeks to 26 weeks, transformer lead times for pad mount transformers have extended to 40 weeks and substation voltage regulators were 56 weeks when I last spoke with Green Mountain Power.

Shipping and transportation have also put significant pressure on construction. It is extremely difficult to secure guaranteed shipping dates, and shipments are often delayed due to congestion at ports. On a recent project that we worked on, delivery of racking equipment was delayed by over three months. Force Majeure claims due to shipping have impacted lenders and tax equity, and this has also resulted in additional schedule contingency being required in construction contract schedules.

Lastly, the labor environment has also become more difficult. While it is difficult to equate this to longer construction timeframes, the impact that GPS has observed is that it has become harder to find construction contractors that are not already fully committed. This is an issue that is affecting nearly all businesses in Vermont and has become a focus of the Scott Administration and Legislature in recent weeks.

Regarding the timeframe for the requested extension, we generally support REV and AER’s request for a one-year extension. While the general increase in equipment lead times is less than the time requested by REV and AER, other factors such as equipment required for

interconnection (i.e. if voltage regulators are required) and the timing of issuance of a Project's Certificate of Public Good ("CPG") required additional time. The CPG is the key document that enables developers to begin construction of a project, and it is standard industry practice to secure the CPG before taking actions, such as procurement, that cannot be easily undone if a project is not approved. Because of Vermont's difficult winter construction period, if the timing of a CPG results in procurement of equipment with deliveries in the winter, it may not be possible to commence construction for an additional 4 or 5 months. While there are certainly examples where an extension of less than a year is required, we believe that a one-year extension for all projects would result in less burden on the Commission due to requests for additional extensions.

Thank you for your consideration. If there are any questions, please contact me at [nvandal@greenpeaksolar.com](mailto:nvandal@greenpeaksolar.com) or 206-601-8834.

Best regards,



Nathaniel Vandal  
Principal, Green Peak Solar, LLC