



February 10, 2022

Vermont Public Utility Commission  
Attn: Holly Anderson, Clerk of the Commission  
112 State Street  
Montpelier, VT 05620-2701

Re: Case Number 20-0789-INV – Norwich Solar’s Response to the Commission’s Request for Comments on Requests to Extend Commissioning Deadlines.

Dear Commissioners:

Norwich Solar appreciates the opportunity to submit the following comments in response to the Vermont Public Utility Commission’s (“Commission”) February 1, 2022 Order Requesting Comments on Requests to Extend Commissioning Deadlines. Norwich Solar supports the motions filed by Renewable Energy Vermont and AllEarth Renewables, Inc. and respectfully requests the Commission to 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.

Due to the continuing supply chain disruptions caused by the COVID-19 pandemic, commissioning deadlines that fall on or after January 1, 2022 through December 31, 2022 should be extended for one year.

The Vermont and national solar energy industry continues to be plagued by significant COVID-related global supply chain disruptions, including scarce raw materials, continued manufacturing shutdown and delays, shipping delays and subcontract employee staffing. All of which are beyond a Certificate of Public Good (“CPG”) Holder’s control. These interruptions added to frequent CPG seasonal construction restrictions are creating significant uncertainty in assuring projects are installed and commissioned within the one-year timeframe.

Current supply chain constraints on key solar components such as modules and labor constraints have created significant uncertainty in assuring projects are commissioned within the one-year commissioning requirement. For example, one of our suppliers, BayWa r.e., reported “I can tell you that production factories are being shut down due to Covid breakouts regularly and significantly changing the lead time and available modules on the marketplace.” Production came to a halt when the pandemic first hit. When the economy rebounded faster than expected, demand soared, and manufacturing couldn’t keep up.<sup>1</sup> Uncertainty of module availability can

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<sup>1</sup> Nicolás Rivero, Here’s how supply chain issues are affecting renewable energy projects, World Economic Forum (2021), <https://www.weforum.org/agenda/2021/11/supply-chain-problems-solar-power-renewable-energy/> (last visited Feb 10, 2022).



have a cascading effect on other key solar components such as racking, since the type and design of modules dictates the type of racking needed.

Critical electrical components have also become supply constrained. Subcontractors of Norwich Solar have experienced a doubling in lead times for certain equipment with some items not available at all and others not available for 18-20 weeks instead of the usual 4-6 weeks. It has been reported that plastic shortages are affecting lead times on electrical components such as connectors, cables, and relays. In addition, steel and wood shortages are affecting the packaging and shipping of cable.<sup>2</sup>

Labor shortages in Vermont are also adding to the uncertainty of commissioning solar projects within the one-year CPG deadline. Norwich Solar has observed that several of our subcontractors do not have enough employees on jobsites. Recent studies have shown that Vermont has the fourth-largest labor shortage in the United States.<sup>3</sup> Labor shortages in Vermont have hit the trade sector particularly hard, including electricians.<sup>4</sup> RunTime Solar (a subsidiary of Norwich Technologies, Inc. specializing in operations and maintenance of commercial solar facilities) has been unable to successfully hire qualified electricians.

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<sup>2</sup> Meena Thiruvengadam, Industrial buyers face a resin market with tight supplies, spiking prices, Supply Chain Dive (2021), <https://www.supplychaindive.com/news/resin-costs-plastic-manufacturers-industrial-buyer/605793/> (last visited Feb 10, 2022).

<sup>3</sup> April Barton, Vermont's worker shortage is among the greatest in the country, study says, The Burlington Free Press (2021), <https://www.burlingtonfreepress.com/story/news/2021/09/14/vermont-has-fourth-largest-labor-shortage-according-study/8330277002/> (last visited Feb 10, 2022).

<sup>4</sup> Courtney Kramer, Scott looks to improve skilled trade sector in Vermont, Local 22/44 News (2022), <https://www.my Champlain Valley.com/news/local-news/scott-looks-to-improve-skilled-trade-sector-in-vermont/> (last visited Feb 10, 2022).