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Via ePUC
February 11, 2022

Holly R. Anderson, Clerk
Vermont Public Utilities Commission
112 State Street #4
Montpelier, Vermont 05620

Re: Acorn Comment re Case 20-0789-INV In Support of Net Metered Deadline Extension

Dear Ms. Anderson:

Thank you for the opportunity to comment on Renewable Energy Vermont's January 18, 2022 commissioning deadline extension request for all net-metered and standard-offer projects with commissioning deadlines in the coming year. Acorn Renewable Energy Co-op supports REV's motion.

REV's motion and the Commission's request for comments anticipate a motion for extension of time that Acorn planned to file this spring with respect to its own project. Acorn Energy Solar 4 LLC's Hinesburg landfill project No. 21-0250-NMP (CPG date: 07/06/2021) needs a CPG extension because of delays caused by PFAS-type chemicals discovered in wells down grade from the Hinesburg landfill, on which our project will be built. Hinesburg is working with the Agency of Natural Resources on a landfill monitoring plan, which must be completed before Acorn's project can be subscribed for or built. Once the town and ANR have completed their work and ANR has issued a post-closure amendment to the Hinesburg landfill, Acorn will face all of the supply chain problems raised by other commenters on this issue and will definitely require an extension of its CPG deadline in order to be completed.

Although the recent Omicron surge in Vermont appears to be tapering off, supply chain issues affecting Vermont projects are global in nature and compound every other problem faced by projects permitted over the past year. The Commission can enhance regulatory efficiency by dealing with all the applicable CPG deadlines at once rather than asking CPG holders to accurately forecast what additional time they will need regarding specific project delays.

Acorn's Hinesburg Landfill project (No. 21-0250-NMP) originally resulted from Acorn's response to a Hinesburg Request for Proposals. A one year extension of the 21-0250-NMP CPG will help Hinesburg reach Goal 8.2 of its town plan which is to "[s]upport the development of alternative renewable energy sources and business opportunities and site an additional 13,517 to 23,594 MWh of annual generation in Hinesburg to contribute to Vermont's goal of obtaining 90% of energy from renewable sources by 2050."

Please call with any questions.

Sincerely,



Benjamin Marks

This letter has been electronically filed via ePUC.