

March 24, 2022

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05620-2701

Re: Case No. 21-1109-PET – Petition of Green Mountain Power Corporation for approval to modify service territory pursuant to 30 V.S.A. § 249

Case No. 21-1107-PET – Petition of GLOBALFOUNDRIES U.S. 2 LLC for a Certificate of Public Good, pursuant to 30 V.S.A. § 231 to operate a Self-Managed Utility

Dear Ms. Anderson:

In response to the motions filed by AllEarth Renewables, Inc. and the Conservation Law Foundation on March 10, 2022, Green Mountain Power (GMP) does not believe that the Commission's February 17, 2022 Order requires further clarification, and refers to GMP's October 8, 2021 briefing regarding the Commission's authority to regulate companies owning and operating distribution infrastructure and engaging in the activities proposed by GLOBALFOUNDRIES U.S. 2 LLC under a number of sections in Title 30, Chapter 5, including Section 203 (jurisdiction of certain public utilities).

Thank you, and if you have any questions, please feel free to contact me.

Sincerely,



Geoffrey H. Hand, Esq.
Dunkiel Saunders Elliott Raubvogel & Hand, PLLC

cc: Service List (via ePUC)