

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of GlobalFoundries U.S. 2 LLC requesting)
a certificate of public good, pursuant to 30 V.S.A. § 231,) Case No. 21-1107-PET
to operate a Self-Managed Utility)

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

**MOTION TO AMEND THE SCHEDULING ORDER
AND EXTEND FILING DEADLINE**

GLOBALFOUNDRIES U.S. 2 LLC (“GlobalFoundries”) and Conservation Law Foundation, Inc. (“CLF”), by and through their attorneys, respectfully request that the Public Utility Commission grant this motion and amend the June 30, 2022 Amended Schedule to extend by one day the deadline for the parties to file a hearing schedule, stipulated testimony and exhibit list, and prehearing motions. In support thereof, the movants state as follows:

1. In its June 30, 2022 scheduling order, the Commission adopted an August 1, 2022 deadline for the “parties to file (1) a joint proposal or proposals containing a schedule and order of witnesses for the hearing, each party’s estimate of time it needs to cross-examine each witness, a list of issues that will be covered during a party’s cross-examination, and any times during the hearing days that specific witnesses, if any, will not be available to testify; (2) a stipulated joint list of prefiled testimony; and (3) prehearing motions, including motions requesting the opportunity for direct examination of a witness and motions objecting to holding the evidentiary hearing remotely.”

2. GlobalFoundries and CLF have been engaged in active, ongoing settlement discussions concerning a number of issues arising from this proceeding, and have committed to conclude those discussions by today (August 1, 2022).

3. The outcome of GlobalFoundries and CLF's settlement discussions will have a material impact on the filings due today, as it will influence the extent of cross-examination and the scope of issues addressed by those parties at the hearing. Accordingly, if the parties were to file a schedule and motions today while settlement discussions are ongoing, there is a significant chance they would need to revise their filings upon completion of their discussions.


4. While the parties are cognizant of the Commission's general requirement that requests for alteration of a deadline be filed three days in advance, in the interests of efficiency and encouraging the parties' efforts to settle aspects of their disputes, GlobalFoundries and CLF respectfully request that the Commission exercise its discretion to grant a one-day extension to allow the parties to conclude settlement discussions and plan for the hearing in light of the outcome of those discussions. The requested one-day extension will not impact any of the other deadlines set forth in the Amended Schedule.

5. GlobalFoundries and CLF have communicated with the other parties to this proceeding regarding their request. Green Mountain Power, Vermont Electric Power Company, Inc. and Vermont Transco LLC, the Vermont Department of Public Service, the Vermont Agency of Natural Resources, the Vermont Agency of Commerce and Community Development, and AllEarth Renewables, Inc., have confirmed their agreement to a one-day extension. At the time of filing, the movants have not heard back from the other parties.

WHEREFORE, for the foregoing reasons, GlobalFoundries and CLF respectfully request that the Commission grant their Motion and extend the August 1 deadline by one day.

Dated at Burlington, Vermont, this 1st day of August, 2022.

CONSERVATION LAW FOUNDATION

By: 
Chase S. Whiting
Conservation Law Foundation
15 East State Street, Suite 4
Montpelier, VT 05602
(802) 223-5992 x. 4013
(802) 223-0060 (fax)
cwhiting@clf.org

Dated at Burlington, Vermont, this 1st day of August 2022.

GLOBALFOUNDRIES U.S. 2 LLC

By: /s/ Shapleigh Smith, Jr.
Shapleigh Smith, Jr., Esq.
Justin B. Barnard, Esq.
DINSE
209 Battery Street
Burlington, VT 05401
(802) 864-5751
ssmith@dinse.com
jbarnard@dinse.com

cc: service list via ePUC