

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 21- 4085-INV

Investigation to review the 2022
Implementation of the standard offer program

REPLY COMMENTS OF ALLEARTH RENEWABLES, INC.

AllEarth Renewables, Inc. (“AER”) offers these comments in reply to the November 8, 2021 comments of the Department of Public Service (“DPS”) in this matter. In those comments, DPS suggests that the Commission move to an every other year cycle for the RFP process. AER respectfully requests that the Commission reject this suggestion. The aggressive development of standard offer projects is more important than ever given the climate crisis and Vermont’s passage of the Global Warming Solutions Act, and this is not the time to move the process in the opposite direction. The DPS concerns about process efficiency also do not appear to take into account the effective and efficient way that VEPP Inc. has carried out its responsibilities as standard offer facilitator over the years, and the Commission’s own experience in moving the annual standard offer implementation cases to conclusion in timely fashion.

Thank you for this opportunity to comment.

Dated this 3rd day of December, 2021

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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