

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 20-2935- INV

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Investigation to review the 2021  
Implementation of the standard offer program

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**COMMENTS OF ALLEARTH RENEWABLES, INC. ON HEARING  
OFFICER'S PROPOSAL FOR DECISION**

AllEarth Renewables, Inc. ("AER") offers these comments on the Hearing Officer's March 22, 2021 Proposal for Decision (PFD) issued in this matter. AER is filing these comments in advance of the April 5, 2021 comment deadline, in order that other parties may have full and fair opportunity to address them in their own comments.

The PFD recommends Commission acceptance of the Public Service Department's proposal that a 15% margin be applied to the weighted average of the successful 2020 solar bids in order to set the solar price cap for 2021 standard offer bids. AER submits that it is appropriate to apply a similar margin to the large (>100 kW) wind category. Several factors support this contention. First, unlike the solar block, the large wind category has not induced bids to any meaningful degree, and in some instances not at all. Second, the enactment of Vermont's Global Warming Solutions Act last year makes it even more imperative on legal and policy grounds that renewable energy projects of diverse sizes and technologies be expeditiously developed. Third, there is no sign of meaningful abatement or elimination of the tariffs that have significantly added to the costs of key wind generation components, and the aggressive timetable in standard offer contracts will require a wind project proponent to make significant financial commitments around securing those components. Lastly, the impacts on shipping that have resulted from the COVID-19 pandemic, exacerbated by the events surrounding the *Ever Given* in the Suez Canal within the last week, add supply chain risks and costs that could not have been fully foreseen during the course of this Commission proceeding. Applying the same rationale to wind generation that the Hearing Officer has applied to solar will help ensure meaningful participation by all technologies recognized within the scope of the standard offer program, while not compromising the permitting requirements that projects must go through under applicable law.

For these reasons, AER respectfully requests that the Commission set the large wind price cap at \$0.133 per kWh, fixed for 20 years.

Thank you for this opportunity to comment.

Dated this 31<sup>st</sup> day of March, 2021

AllEarth Renewables, Inc.

By: /s/ **David Mullett**

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