

March 17, 2021

Via ePUC

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

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

Dear Ms. Anderson:

Green Mountain Power Corporation (“GMP”) files for Commission review the attached Petition seeking approval to modify its service territory pursuant to 30 V.S.A. § 249 in the event that the Commission approves GLOBALFOUNDRIES 2 U.S. LLC’s (“GF”) § 231 Petition seeking to operate a Self-Managed Utility (“GF Petition”) in Case No. 21-1107-PET. The GF Petition, if granted, would authorize GF to take over electric service of its Essex Campus from GMP and to manage its own electric supply going forward. This § 249 Petition would in turn authorize the necessary adjustment to GMP’s service territory to carve out of GF’s Essex Campus from its existing service area for so long as GF or any successor in interest operates in compliance with the conditions imposed by the Commission in the GF Petition proceeding.

As this § 249 Petition is conditioned upon the Commission’s approval of the GF Petition, both petitions are being filed concurrently so that the Commission can review them in tandem and potentially consolidate any proceedings for scheduling purposes. The materials supporting this Petition, which include the prefiled testimony and exhibits of Joshua Castonguay and Scott Anderson, are also being filed in both proceedings.¹

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

Sincerely,



Geoffrey H. Hand, Esq.

Encls.

¹ Mr. Castonguay’s exhibits include the Memorandum of Understanding between GMP, GF, and Vermont Electric Power Company, Inc. (Exh. GMP-JC-1). This document has also been filed by GF as an exhibit to Mr. Reider’s testimony in the GF § 231 proceeding (Exh. GF-GR-2).