

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 19-3529-PET

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Petition of Vermont Gas Systems, Inc. for approval of an Alternative Regulation Plan, pursuant to 30 V.S.A. § 218d	
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**VERMONT GAS SYSTEMS, INC.’S  
MOTION TO LIFT TEMPORARY STAY**

By this filing, Vermont Gas Systems, Inc. (“VGS”) moves the Vermont Public Utility Commission (“Commission”) to lift the temporary stay in above-captioned proceeding.

On September 13, 2019, VGS filed a Petition in this case for approval of an Alternative Regulation Plan in accordance with 30 V.S.A. § 218d. On April 9, 2020, VGS moved for a stay of this proceeding and requested an extension of the Alternative Regulation Plan approved in Case No. 19-2932-PET. On April 17, 2020, the Commission granted VGS’s request for a stay, and on April 23, 2020, approved the extension of VGS’s current Alternative Regulation Plan “until such time as the Commission approves a successor plan, but not later than September 30, 2021.”

Concurrent with this Motion, VGS is filing a Revised Petition for Approval of an Alternative Regulation Plan (the “Proposed Plan”). The Revised Petition and Proposed Plan are substantially similar to the plan proposed in VGS’s initial September 13, 2019 filing in this case, and include some modifications based on VGS’s consideration of the Proposed Plan in the intervening months during which this matter has been stayed. The Revised Petition and Proposed Plan are supported by the Prefiled Direct Testimony and Exhibits of Neale Lunderville, Jill Pfenning, and Ashley Wainer. Accordingly, VGS respectfully moves the Commission to lift the stay.

DATED at Burlington, Vermont, on this 25<sup>th</sup> day of November 2020.

VERMONT GAS SYSTEMS, INC.

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