

May 14, 2018

By ePUC

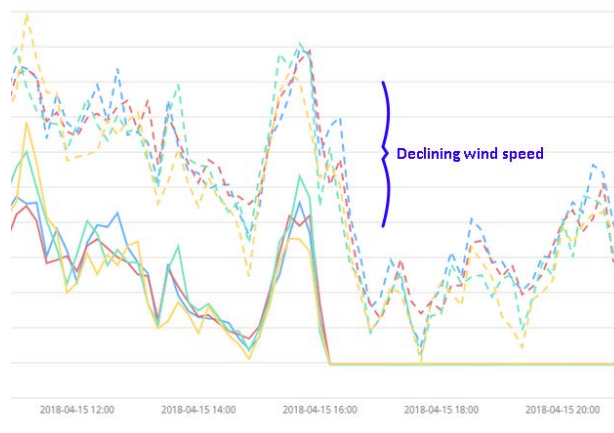
Ms. Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620-2701

Re: Case No. 18-1040-INV - McLane icing complaint re: Georgia Mountain Community Wind

Dear Ms. Whitney,

On behalf of Georgia Mountain Community Wind, LLC ("GMCW"), we are writing in response to the *Response of Melodie and Scott McLane to Response of Georgia Mountain Wind to McLane Icing Complaint* filed on May 7, 2018.¹ While the Public Utility Commission ("Commission") has not set a formal deadline for replying to the McLanes, GMCW wishes to respond briefly to a few of the McLanes' arguments. In short, the McLanes have provided no new information concerning the events of April 15, 2018 that warrants the Commission opening an investigation.

First, the McLanes claim that the decline in the Project's power output between 3:00 and 4:00 p.m. on April 15, 2018 demonstrates that icing occurred.² *McLane Response* at 1. On the contrary, power production declined during that period for the simple reason that the wind speed declined. The graph below provides wind speed and power data, and clearly shows that the declining power output precisely tracked wind speed, until the point where the Project automatically went into pause mode at approximately 4:00 PM.



The above figure is taken from *Attachment 1* hereto, which provides the complete graph of the Project's power output and wind speed for April 15th from 12:00 AM to approximately 4:30 pm.

¹ See Attachment 3 of GMCW's April 25, 2018 response, ePUC Document No. 264875/130924.

² ePUC Document No. 262686/130924.

Second, the McLanes question the reliability of the data from GMCW's meteorological tower ("MET"), noting that icing "should have been expected" on April 15. *McLane Response* at 1. The question is not whether icing was "expected" on that day, but rather, were the temperature and humidity conditions at any point on April 15th such that ice could form on the turbines. The McLanes provide no reason whatsoever to discount the MET data, GMCW's use of which was specifically authorized by the PUC under the Revised Winter Operating Protocol ("Revised WOP"). The Revised WOP calls for a shutdown when the air temperature is 1° C and relative humidity is 93% or higher (and in practice, GMCW is applying trigger values of 2° C and relative humidity of 92% or higher). *See GMCW's April 25th filing, pages 1-2.* GMCW is thus utilizing a more protective, conservative approach to anticipating ice formation than the Revised WOP requires. Moreover, GMCW advises the PUC that the MET equipment is regularly calibrated.

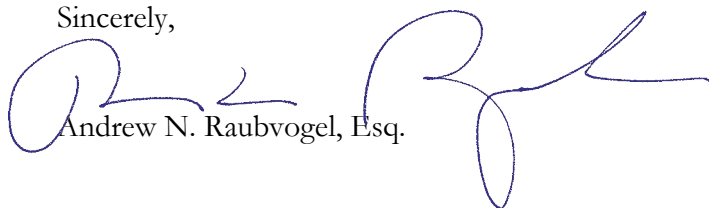
Third, the McLanes argue that because GMCW did not call Ms. McLane back on April 15th, it violated the Commission's February 1, 2018 Order in Case No. 17-2571-INV (requiring GMCW to return calls made to its complaint line within one hour). As GMCW previously reported to the Commission in its April 25th filing, Ms. McLane's voicemail reporting the alleged icing stated "please give me a call back or shut them down." *See Attachment 2* hereto (voicemail recording).³ The turbines automatically shut down approximately one-half hour after that call, and irrespective of the underlying reason for the shutdown, GMCW followed Ms. McLane's specific instructions.⁴

Finally, the McLanes raise several other issues unrelated to April 15th, which GMCW feels compelled to address briefly:

- The McLanes ask that GMCW be required to install cameras. *McLane Response* at 2. The Commission previously considered and rejected this request in Case No. 17-2571-INV, Order of 2/1/18 at 15, and there is no basis to revisit that decision. Rather, issues as to the efficacy of the Revised WOP should be addressed after GMCW submits its annual report.
- The McLanes ask that GMCW be required to install continuous sound monitoring. *McLane Response* at 3. Like video monitoring, the Commission has already considered and rejected this request. *Id.* at 15. There is no basis for the Commission to revisit this issue.
- The McLanes make broad, new claims regarding shadow flicker. *McLane Response* at 4. Shadow flicker is not regulated under the CPG and is beyond the scope of this case.

Thank you for your attention to this matter, and please do not hesitate to contact me should you have any questions.

Sincerely,



Andrew N. Raubvogel, Esq.

Encls.

³ Due to file type upload limitations on ePUC, Attachment 2 (an mpg audio file) is being provided via thumb drive with a hard copy of the filing via First Class Mail.

⁴ The McLanes' May 7th filing make it abundantly clear that they wish to minimize all contact with GMCW and not to engage directly other than via e-mail. *McLane Response* at 2.