

November 1, 2019

By Hand Delivery and E-Mail

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

Re: Docket No. 7250 – Amended Petition of Deerfield Wind, LLC for a certificate of public good authorizing it to construct and operate a 15-turbine, 30 MW wind generation facility in Searsburg and Readsboro, Vermont.

Dear Ms. Whitney,

Pursuant to the Scheduling Order issued by the Public Utility Commission (“Commission”) on October 10, 2019, the Commission required the Department of Public Service (“Department”) and CPG Holder Deerfield Wind, LLC (“Deerfield”) to provide responses to the Commission’s Order of April 25, 2019, which addressed the following:

1. “The Department’s recommendation of installing the microphone at Site C-alt on a separate support structure than the barn should be followed if feasible. The report must explain whether this was feasible, and if not, provide a clear description of how potential interference of the barn structure has been addressed in the monitoring and data analysis.”
2. “[W]e request that the Department have its consultant file a revised fall monitoring report that normalizes all reported times to the same time standard, with annotations explaining any changes from the initial fall monitoring report.”
3. “[T]he Department and Deerfield must ensure that implementation of the spring monitoring complies with the specified Deerfield turbine on/off requirements, and that the report provides clear evidence and documentation of such compliance, or discussion of any deviations and the implications for the conclusions drawn from the monitoring.”

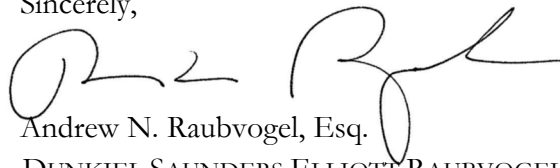
Order at 6.

The Department filed a response with the Commission on October 23, 2019. Deerfield has reviewed the Department’s response, and believes that it adequately and completely addressed all three issues. With respect to issues # 1 and 2, Deerfield has nothing further to add.

With respect to issue #3, the Spring 2019 Sound Monitoring Compliance Report (Cross Spectrum Acoustics, “CSA”) addresses the specified turbine on/off requirements. Section 3.2.4 describes the 20 attempted curtailments at the Deerfield Wind Project during the monitoring period. See Table 2. Section 3.3.5 discusses data issues regarding a number of the curtailments and explains how these issues were addressed by CSA. As detailed in the report, the specified data issues did not impact CSA’s ability to draw conclusions regarding the Project-related sound levels at each of the monitoring sites. See Spring 2019 Report, Section 5. Deerfield would further observe that these curtailment issues arose due to Project-related software and operational issues, and were not due to any effort by Deerfield to interfere with the sound monitoring program.

Deerfield thanks the Commission in advance for its consideration of the above. Please let me know if you have any questions or require further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew N. Raubvogel". The signature is fluid and cursive, with a large initial "A" and "R".

Andrew N. Raubvogel, Esq.

DUNKIEL SAUNDERS ELLIOTT RAUBVOGEL & HAND, PLLC

cc: Service List

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Amended Petition of Deerfield Wind, LLC for)
a certificate of public good authorizing it to)
construct and operate 15 turbine, 30 MW wind)
generation facility, and associated transmission)
and interconnection facilities, on approximately)
80 acres in the Green Mountain National)
Forest, located in Searsburg and Readsboro,)
Vermont, with 7 turbines to be placed on the)
east side of Route 8 on the same ridgeline as the)
existing GMP Searsburg wind facility (Eastern)
Project Area), and 8 turbines along the ridgeline)
to the west of Route 8 in the northwesterly)
orientation (Western Project Area))

Docket No. 7250

CERTIFICATE OF SERVICE

I, Gillian Bergeron, certify that on November 1, 2019, I forwarded copies of Deerfield Wind, LLC's *Letter to the Public Utility Commission in Response to PUC 4/25/19 Order* to the following service list by the delivery method noted:

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Dated at Burlington, Vermont, this 1st day of November, 2019.

By:



Gillian Bergeron
Paralegal