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VIA HAND DELIVERY

January 17, 2020

Judith C. Whitney, Clerk
Vermont Public Utility Commission
People's United Bank Building, 4th Floor
112 State Street
Montpelier, Vermont 05620-2701

Re: Docket 7628
Petition of Green Mountain Power Corporation ("GMP" or "Company") et al. re
Kingdom Community Wind Project ("KCW")

Status Report Regarding Aircraft Detection Lighting System Approval

Dear Ms. Whitney:

As you are aware, GMP provides regular status reports to the Public Utility Commission ("PUC") about its work to comply with Condition 34 of the Order and Certificate of Public Good in the above-referenced docket. Since GMP's November status report, there have been significant developments regarding our efforts to install an Aircraft Detection Lighting System ("ADLS") at the KCW site, warranting this updated report before our next scheduled update in May.

In December 2019, GMP received a communication from Vestas, the manufacturer of the proposed ADLS, indicating that the current plan for KCW would not meet the required radar standards because Vestas recently discovered that the planned turbine-mounted solution would have a smaller than anticipated radar range, and therefore would be unable to view the airspace required by the Federal Aviation Administration ("FAA"). Vestas also indicated that it could not mount its equipment on pre-existing cell towers or meteorological towers as had been planned. This information from Vestas came as a surprise to GMP, since we had selected this ADLS product specifically because we had previously been advised by Vestas that this type of mounting was possible and early radar models of the site had all been positive, though testing of icing impact has been ongoing and unsuccessful to date. In follow up discussions with Vestas, it offered to deliver an ADLS system with appropriate radar coverage mounted on two new thirty-meter towers. However, the locations of these towers would likely experience significant permitting challenges as they would require what appear to be significant impacts to a Montane

Yellow Birch Spruce Fir Forest and other natural resources, which is something GMP has sought to avoid.

GMP has been working with Vestas as well as the FAA for nearly three years to design a solution that would meet FAA requirements, limit environmental impacts, and meet Condition 34 by reducing the amount of time lights are on at KCW. Before selecting the Vestas technology, GMP had considered two similar products approved by the FAA and manufactured by Laufer Wind and Terma, respectively. Based on conversations with the Agency of Natural Resources, Terma's product was excluded from the KCW site because it required installation of equipment off the KCW site that likely would create significant impacts to sensitive and high-quality environmental resources atop Eden Mountain. Laufer Wind ceased operation. The turbine-mounted solution by Vestas had addressed all GMP's concerns and was very promising, until this latest communication. It now appears it is no longer a viable solution at KCW.

At this time, GMP is re-evaluating options. We have had initial conversations with the FAA about the existence of any other approved products similar to Vestas' ADLS, and we continue to search for other technology to reduce lighting when possible. Although this Vestas decision is a setback, GMP remains fully committed to meeting its CPG obligations and installing light reducing technology once the technology is available for our KCW site. We will plan to provide the PUC with further updates as we develop our next approach, no later than the next status report due date in May 2020.

If GMP can address additional questions at this time, please do not hesitate to contact me.

Sincerely,



Preston Gregory

cc: Docket No. 7628 Service List

PUC Docket No. 7628 - SERVICE LIST

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