

March 15, 2021

By E-Mail and First-Class Mail

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

**Re: Docket No. 7250 – Deerfield Wind Project
Comments on Fall 2020 Sound Monitoring Report**

Dear Ms. Anderson,

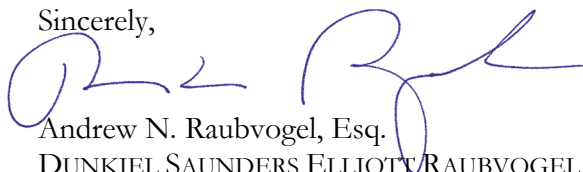
Pursuant to the Scheduling Order issued by the Vermont Public Utility Commission (“Commission” or “PUC”) on January 12, 2021, CPG Holder Deerfield Wind, LLC (“Deerfield”) hereby provides its comments on Cross Spectrum Acoustics’ (“CSA”) Fall 2020 Sound Monitoring Report for the Deerfield Wind Project.

The attached memorandum from Deerfield’s sound consultant, RSG, confirms CSA’s conclusion that “based on the measurements and analysis described in this report and conducted in accordance with the Protocol and additional guidance from the PUC, the “turbine-only” sound level at Site C during the Fall 2020 monitoring period was 39 dBA, *L_{eq}*.” CSA Report at 2. RSG reached its conclusions based upon a review of CSA’s analysis as well as RSG’s re-analysis of the sound data.

All of the monitoring results from sound testing in 2018, 2019, and 2020 now demonstrate that the Project complies with the CPG’s noise limits.¹ In addition, the results of the Fall 2020 testing confirm that the 40 dBA trigger is not met for requiring an outdoor to indoor noise reduction (“OINR”) test at the Shea residence under the PUC-approved Sound Protocol. The Commission should thus find that the CPG’s sound monitoring requirements, as specified in the Sound Protocol, have been satisfied and the proceeding should be closed.

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

Sincerely,



Andrew N. Raubvogel, Esq.
DUNKIEL SAUNDERS ELLIOTT RAUBVOGEL & HAND, PLLC

Encl.

cc: Service list (via first-class mail)

¹ See Commission Order of January 9, 2020.

**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 March 15, 2021, I forwarded copies of Deerfield Wind, LLC's: *Letter to the PUC re Fall 2020 Sound Monitoring Report* to the following service list by the delivery method noted:

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Dated at Burlington, Vermont, this 15th day of March, 2021.

By:



Gillian Bergeron
Paralegal



March 15, 2021

Robert Batarags
Asset Manager
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1125 NW Couch St Suite 700
Portland, OR 97209

RE: Review of CSA Fall 2020 Deerfield Wind Sound Monitoring Report

Dear Mr. Batarags:

At the request of Deerfield Wind, LLC ("Deerfield"), we reviewed the Cross Spectrum Acoustics (CSA) "Deerfield Wind – Fall 2020 Sound Monitoring Compliance Report," (the "Report") dated January 11, 2021. In addition to the report, we reviewed the raw sound data collected by CSA to validate their findings.

Overall, we found the Report was done consistent with the PUC-approved Sound Monitoring Protocol (the "Protocol") for the Deerfield Wind Project (the "Project") and we agree with the findings where the analysis was done according to that Protocol. In addition, given that CSA is now excluding wind gusts greater than 5 m/s, this is the first season of monitoring that fully follows the Protocol and the results should take precedence over previous seasons of sound monitoring. Based on this, and based on our analysis of the same data, we agree with CSA that the Project-related sound levels at Monitor C do not exceed 39 dBA (see Table 1, Columns 2 and 3 below). As a result, the project complies with the CPG sound limits and furthermore, OINR testing at the Shea residence is not required.

The Report goes beyond the Protocol by providing an uncertainty analysis that was requested by the PUC for this round of testing. While only the Protocol is the methodology used to determine compliance with the CPG noise limit, we have nonetheless reviewed CSA's uncertainty analysis. CSA stated that it analyzed uncertainty using ANSI S12.9 Parts 2 and 3. We agree with their findings under Part 2. For their remaining analysis under Part 3, we found that CSA subtracted background sound levels using only the overall A-weighted sound level rather than the 1/3 octave bands. The latter is required under ANSI S12.9 Part 3 where 1/3 octave bands are available.

RSG re-analyzed the sound data using the 1/3 octave bands collected by CSA. We used the same six valid periods found by CSA and the same data exclusions. The results are shown in Table 1, columns 4 and 5.

TABLE 1: CSA'S RESULTING SOUND LEVELS AT STATION C FOR FALL 2020 AND RSG'S RE-ANALYSIS

1	2	3	4	5
	CSA Reported Sound Level at Monitor C	RSG Calculated Sound Level using Protocol	RSG Calculated Sound Level using ANSI S12.9 Part 3	Uncertainty range using ANSI S12.9 Part 3
Hour before Curtailment 7	37	37	36	35 to 37
Hour before Curtailment 21	39	38 ¹	37	36 to 38
Hour before Curtailment 22	39	39	38	37 to 38
Hour after Curtailment 22	39	39	38	37 to 38
Hour after Curtailment 23	39	39	39	38 to 39
Hour before Curtailment 24	39	39	37	36 to 38

Summary and Conclusions

The results can be summarized as follows:

- 1) When CSA and RSG used the Protocol methodology on the same data (see Columns 2 and 3 of Table 1), the results are nearly identical, confirming the validity of the CSA analysis. The overall sound levels were at least 6 dB below the CPG exterior limit of 45 dBA. In addition, the Protocol's 40 dBA threshold for requiring OINR testing was not met.
- 2) When RSG recalculates the overall Project sound level using ANSI S12.9 Part 3's methodology, using 1/3 octave bands to subtract background, our results are 0 to 2 dB lower than the results using CSA's analysis under the Protocol methodology (see Table 1, Column 4). This points out the conservative nature of CSA's analysis under the Protocol.
- 3) With respect to CSA's supplemental uncertainty analysis, if the background is subtracted using the 1/3 octave band methodology of ANSI S12.9 Part 3 (see Column 5 of Table 1) the highest one-hour sound level within the uncertainty

¹ The 1 dB difference in CSA'S and RSG's results for Curtailment 21 is due to rounding. The actual difference is a few hundredths of a dB around 38.5 dBA.



band for any hour is 39 dBA. We note that the Protocol's OINR testing threshold does not require ANSI S12.9 Part 2 or Part 3 uncertainty analyses.

We conclude that the sound level from the Deerfield Wind Project at Monitor C does not exceed 39 dBA, even accounting for uncertainty under both ANSI S12.9 Parts 2 and 3.

Sincerely,

KENNETH KALISKI, P.E., INCE BD. CERT.
Senior Director