



*Kingdom Community Wind
1300 Edward Dr.
Lowell, VT 05847*

*Preston Gregory
Kingdom Community Wind Supervisor*

*Phone: (802) 229-7922
Preston.gregory@greenmountainpower.com*

VIA ePUC
May 13, 2021

Holly Anderson, Clerk
Vermont Public Utility Commission
People's United Bank Building, 4th Floor
112 State Street
Montpelier, Vermont 05620-2701

Re: Case No. 20-1951-PET
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. Anderson:

This letter serves as a status report about Green Mountain Power's ongoing efforts to obtain approval of an Aircraft Detection Lighting System ("ADLS") in order to comply with Condition 34 of the Public Utility Commission's May 31, 2011 Order and Certificate of Public Good in the above-referenced case.

Since receiving its CPG, GMP has investigated and worked to implement a viable ADLS solution to meet Condition 34. The Federal Aviation Administration ("FAA") approved the use of ADLS technology at wind farms in 2015. Since that time, GMP has reviewed several products with individual approval from the FAA, including two that were potentially viable at KCW manufactured by Terma and Laufer Wind. However, after review, we learned that Terma's product would require building structures on the ridgeline, off of the KCW site, a solution that could result in environmental impacts. In 2018, the Agency of Natural Resources ("ANR") requested that we explore less impactful options, and we agreed. The other option, Laufer Wind, seemed potentially viable but ceased operations.

When Vestas, the manufacturer of the turbines at KCW, received FAA approval for its ADLS solution, GMP pursued this option. GMP worked with Vestas diligently and on a regular basis for nearly three years on technical requirements to implement the ADLS technology at the KCW site. Unfortunately, in December 2019, Vestas concluded that its product was not feasible for the KCW site because the intended installation of radar equipment on an existing Eden cell

Ms. Anderson
May 13, 2021
Page 2

tower would not provide the coverage necessary to meet the requirements of the FAA, and ultimately would not be feasible for the KCW site.

Following this setback, GMP has continued to consult with the FAA and research other options. In our November 2020 update, we advised that GMP had started discussions with Detect, Inc. ("Detect") about the suitability of its FAA-approved technology for the KCW site. Since November, GMP has learned that the Detect ADLS solution would utilize a single Doppler radar for aircraft monitoring around KCW, like the Terma solution that GMP analyzed a few years ago. The single radar solution needs to be placed at the highest elevation on the ridgeline, in an area not located on the project site. Therefore, Detect's single radar technology, like Terma's, does not appear to be compatible with this project.

As reported in prior submissions, the KCW site would accommodate a multi-radar installation. GMP continues to search for such a solution that will allow multiple radars around the facility to monitor the required airspace, with coverage that works for this specific site. To date, Laufer Wind (since out of business) and Vestas are the only two vendors that have offered multi-radar-based solutions.

As we have set forth in these status update reports, we are committed to pursuing an ADLS solution for KCW and will continue to search for an appropriate technology, including consulting with the Federal Aviation Administration about any new products as they come into the approval process. We will also work with ANR should any solutions appear to be potentially viable for KCW.

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

Sincerely,



Preston Gregory

cc: ePUC Service List