

Exhibit CS-BW-13

Comments from BCRC Energy Committee

Brad Wilson

From: Jim Sullivan <jsullivan@bcrcvt.org>
Sent: Monday, November 20, 2017 10:24 AM
To: Brad Wilson
Subject: RE: Battle Creek 1 and Chelsea Solar

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From:
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Date: November 20, 2017

Subject: Battle Creek 1 and Chelsea Solar (Revised)

The BCRC's Regional Energy Committee reviewed these two projects at their meeting on November 17, 2017 and offered the following comments, which will be passed on to the BCRC as recommendations.

I. Battle Creek 1 Solar Development - Bennington

The "Battle Creek 1" solar project is proposed for land behind the Carbone auto dealerships and Home Depot. Access for construction and maintenance will be via a ROW off Rice Lane. The developer had presented plans for the project to the energy committee during the initial 45-day notice period. The project design has not changed since that time. The committee reviewed regional plan and town plan maps of the area, noting that there is generally good solar resource potential and that there are some environmental constraints which have been incorporated into the site plan. The committee also noted that the town has identified the parcel as a "preferred site" for solar development in its proposed energy plan amendment to the town plan (in the local hearing process to consider adoption at this time, so it is not yet in effect).

The committee recommended by consensus that a recommendation be advanced that the project appears to be consistent with the Regional Plan, being well-sited from an energy resource/infrastructure and environmental resource perspective, and having minimal visual impacts. The committee asked that any access concerns be fully addressed and that all recommendations from VT DEC regarding wetland impacts be adhered to.

II. Chelsea Solar (Revised) - Bennington

This project has a long procedural history; the original proposal being denied a CPG by the PSB (now PUC) some time ago. The developer agreed to withdraw their appeal and resubmit a new application. The new project proposal is for a 2 MW solar array on 9+ acres, a significantly smaller footprint than the original project, which allows for more screening, a principal concern of the town. To reduce the footprint to this degree the tilt angle of the solar panels had to be lowered, thus allowing them to be moved closer together. The BCRC had offered testimony for the original project, noting that it was in an area of good solar resource potential, with no identified statewide environmental constraints. The Commission also had recognized concerns of a neighborhood group and asked that issues of access to the site be addressed.

Given that the project is in the same area, but on a smaller footprint than the original project, the committee recommended by consensus that the BCRC's comments on the first project be carried forward to the new project, with the note that additional screening is being provided. It was observed that the Town of Bennington has a proposed plan amendment dealing with solar siting which, once adopted and certified pursuant to Act 174, will take precedence over the BCRC position on siting (due to the addition of local constraints).

The committee would like more information on the impact on total annual electricity generation resulting from the reconfigured plan, especially any reduction resulting from the revised tilt angle of 15 degrees. The committee noted that reductions in production caused by such changes would ultimately have to be made up with additional projects elsewhere, especially if similar designs are implemented on other projects to reduce footprint areas. The committee also was interested in the seasonal reduction in generation since production in winter months already is low and reducing it further by flattening the panels is not preferable.

Feel free to contact me with any questions. Thank you.