

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Chelsea Solar LLC, pursuant to)
30 V.S.A. § 248, for a certificate of public)
good authorizing the installation and)
operation of the “Chelsea Solar Project,” a)
2.0 MW solar electric generation facility)
located on Willow Road in Bennington,)
Vermont)

PUC Case # 17-5024-PET

**THIRD SUPPLEMENTAL PREFILED DIRECT TESTIMONY
OF BRAD WILSON ON BEHALF OF PETITIONER**

APRIL 8, 2018

EXHIBITS	
<i>Exhibit CS-BW-28:</i>	<i>(Docket 8302) Section 248 Petition</i>
<i>Exhibit CS-BW-29:</i>	<i>(Docket 8302) Prefiled Testimony of Brad Wilson</i>
<i>Exhibit CS-BW-30:</i>	<i>(Docket 8302) Exhibit CS-ECOS-1, 45 Day Advance Notice Filing</i>
<i>Exhibit CS-BW-31:</i>	<i>(Docket 8302) Exhibit CS-ECOS-2, ALTA Survey</i>
<i>Exhibit CS-BW-32:</i>	<i>(Docket 8302) Exhibit CS-ECOS-3, Aerial View of Property</i>
<i>Exhibit CS-BW-33:</i>	<i>(Docket 8302) Exhibit CS-ECOS-4, Site Plan Construction Details and Elevations</i>
<i>Exhibit CS-BW-34:</i>	<i>(Docket 8302) Exhibit CS-ECOS-5, System Impact Study Agreement</i>
<i>Exhibit CS-BW-35:</i>	<i>(Docket 8302) Exhibit CS-ECOS-6, Decommissioning Plan</i>
<i>Exhibit CS-BW-36:</i>	<i>(Docket 8302) Prefiled Testimony of Scott Michael Mapes</i>
<i>Exhibit CS-BW-37:</i>	<i>(Docket 8302) Exhibit CS-SMM-1, Resume of Scott Michael Mapes</i>
<i>Exhibit CS-BW-38:</i>	<i>(Docket 8302) Exhibit CS-SMM-2, Project EPSC Plan and 3-9020 Appendix A</i>
<i>Exhibit CS-BW-39:</i>	<i>(Docket 8302) Exhibit CS-SMM-3, Project Site Drainage Area Map</i>

EXHIBITS (Continued)
<i>Exhibit CS-BW-40: (Docket 8302) Exhibit CS-SMM-4, Bennington NRCS Soils Map and Fact Sheets</i>
<i>Exhibit CS-BW-41: (Docket 8302) Exhibit CS-SMM-5, Project Stormwater Model and Design Summary</i>
<i>Exhibit CS-BW-42: (Docket 8302) Exhibit CS-SMM-6, Bennington Groundwater Source Protection Area Map</i>
<i>Exhibit CS-BW-43: (Docket 8302) Prefiled Testimony of Mark Kane</i>
<i>Exhibit CS-BW-44: (Docket 8302) Exhibit CS-MK-1, Resume of Mark Kane</i>
<i>Exhibit CS-BW-45: (Docket 8302) Exhibit CS-MK-2, Aesthetic Analysis Report</i>
<i>Exhibit CS-BW-46: (Docket 8302) Exhibit CS-MK-3, Excerpts from 2010 Town of Bennington Plan</i>
<i>Exhibit CS-BW-47: (Docket 8302) Exhibit CS-MK-4, Excerpts from 2007 Bennington Regional Plan</i>
<i>Exhibit CS-BW-48: (Docket 8302) Exhibit CS-MK-5, Town of Bennington Scenic Resource Inventory</i>
<i>Exhibit CS-BW-49: (Docket 8302) Exhibit CS-MK-6, Bennington Parks and Open Space Plan</i>
<i>Exhibit CS-BW-50: (Docket 8302) Prefiled Testimony of Doris Barton</i>
<i>Exhibit CS-BW-51: (Docket 8302) Exhibit CS-DB-1, Resume of Doris Barton</i>
<i>Exhibit CS-BW-52: (Docket 8302) Exhibit CS-DB-2, Arrowood Environmental Assessment</i>
<i>Exhibit CS-BW-53: (Docket 8302) First Supplemental Testimony of Brad Wilson</i>
<i>Exhibit CS-BW-54: (Docket 8302) Exhibit CS-ECOS-4, Site Plan Construction Details and Elevations [Revised]</i>
<i>Exhibit CS-BW-55: (Docket 8302) Exhibit CS-ECOS-7, Apple Hill Road Access Diagram</i>
<i>Exhibit CS-BW-56: (Docket 8302) Exhibit CS-ECOS-8, Geotechnical Report</i>
<i>Exhibit CS-BW-57: (Docket 8302) Exhibit CS-ECOS-9, Structural Design</i>
<i>Exhibit CS-BW-58: (Docket 8302) Exhibit CS-ECOS-10, Secondary Containment System Design</i>
<i>Exhibit CS-BW-59: (Docket 8302) First Supplemental Prefiled Testimony of Scott Michael Mapes</i>
<i>Exhibit CS-BW-60: (Docket 8302) Exhibit CS-SMM-2, Project EPSC Plan and 3-9020 Appendix A [Revised]</i>
<i>Exhibit CS-BW-61: (Docket 8302) Exhibit CS-SMM-7, Project Construction General Permit 3-9020 NOI</i>
<i>Exhibit CS-BW-62: (Docket 8302) First Supplemental Testimony of Mark Kane</i>
<i>Exhibit CS-BW-63: (Docket 8302) Exhibit CS-MK-7, Supplemental Aesthetic Assessment</i>
<i>Exhibit CS-BW-64: (Docket 8302) First Supplemental Testimony of Doris Barton</i>
<i>Exhibit CS-BW-65: (Docket 8302) Exhibit CS-DB-3, Supplemental Environmental Assessment Report</i>
<i>Exhibit CS-BW-66: (Docket 8302) Second Supplemental Testimony of Doris Barton</i>

EXHIBITS (Continued)
<i>Exhibit CS-BW-67: (Docket 8302) Exhibit CS-DB-4, RTE Plant Mitigation Report</i>
<i>Exhibit CS-BW-68: (Docket 8302) Second Supplemental Testimony of Mark Kane</i>
<i>Exhibit CS-BW-69: (Docket 8302) Exhibit SUP2-MK-1, Figure 1 Site Plan</i>
<i>Exhibit CS-BW-70: (Docket 8302) Exhibit SUP2-MK-2, Figure 2 Site Section 1</i>
<i>Exhibit CS-BW-71: (Docket 8302) Exhibit SUP2-MK-3, Figure 3 Site Photographs</i>
<i>Exhibit CS-BW-72: (Docket 8302) Exhibit SUP2-MK-4, Figure 4 Site Photographs</i>
<i>Exhibit CS-BW-73: (Docket 8302) Third Supplemental Testimony of Dori Barton</i>
<i>Exhibit CS-BW-74: (Docket 8302) Exhibit CS-DB-5, Environmental Assessment of Interconnection Route</i>
<i>Exhibit CS-BW-75: (Docket 8302) Partial MOU with ANR 01.16.15</i>
<i>Exhibit CS-BW-76: (Docket 8302) Partial MOU with DPS 02.09.15</i>
<i>Exhibit CS-BW-77: (Docket 8302) Second Partial MOU with ANR 06.15.15</i>
<i>Exhibit CS-BW-78: (Docket 8302) Second Partial MOU with DPS 06.17.15</i>
<i>Exhibit CS-BW-79: 2007 Bennington Regional Plan</i>
<i>Exhibit CS-BW-80: 2009 Bennington Regional Energy Plan</i>
<i>Exhibit CS-BW-81: 2010 Bennington Town Plan</i>

1 **Q1 Please state your name, occupation, and business address.**

2 A1. My name is Brad Wilson. I am a Project Developer at Ecos Energy LLC (“Ecos”). My
3 business address is 222 South 9th Street, Suite 1600, Minneapolis, Minnesota 55402.

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5 **Q2. What is the purpose of your testimony?**

6 A2. This supplemental testimony introduces, as exhibits, the original evidence submitted by
7 Chelsea Solar LLC (“Chelsea”) in Public Utility Commission (“PUC”) Docket # 8302. The
8 exhibits that accompany this testimony are numbered Exhibit CS-BW-28 through CS-BW-81, and
9 they include the original petition, memorandums of understanding, and all testimony and exhibits
10 filed by or on behalf of Chelsea in PUC Docket # 8302. This testimony also introduces, as exhibits,
11 full versions of (i) the 2007 Bennington Regional Plan, (ii) the 2009 Bennington Regional Energy
12 Plan, and (iii) the 2010 Bennington Town Plan. Partial excerpts of these plans were included in
13 the testimony and exhibits of Mark Kane in Docket 8302, however, including the entirety of these
14 documents will benefit the record.

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17 **Q3. Does this conclude your testimony?**

18 A3. Yes.