

Exhibit CS-BW-28

Docket 8302
Section 248 Petition

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Docket No. _____

Petition of Chelsea Solar LLC, pursuant)
to 30 V.S.A. § 248, for a certificate of public)
good authorizing the installation and)
operation of a 2.0 MW solar electric generation)
facility located at 500 Apple Hill Road in)
Bennington, Vermont)

PETITION FOR CERTIFICATE OF PUBLIC GOOD

NOW COMES Chelsea Solar LLC ("Chelsea Solar"), and files this Petition, pursuant to 30 V.S.A. § 248 and Public Service Board ("Board") Rule 5.400, requesting the Board to issue a Certificate of Public Good for the so-called Chelsea Solar Project (the "Project").

By this Petition, Chelsea Solar represents as follows:

I. PETITIONER DESCRIPTION.

1. Petitioner is a Vermont limited liability company located at c/o Allco Renewable Energy Limited, 14 Wall Street, New York, New York, 10005.

II. PERMISSION TO PROCEED *PRO SE*.

2. Pursuant to Rule 2.201¹, the Petitioner petitions to proceed *pro se*. The Petitioner will be

¹ Rule 2.201 provides: (B) Pro se appearances. For purposes of these rules a person appearing pursuant to the authority of this section shall be known as a pro se representative. In its discretion, the Board may permit persons who are not attorneys to appear before it as follows: a partnership may be represented by a partner, and a corporation, cooperative or association may be represented by an officer thereof or by an employee designated in writing by an officer thereof. Such permission shall be given in all proceedings unless, because of their factual or legal complexity or because of the number of parties, the Board is of the opinion that there is a substantial possibility that the participation of a pro se representative will unnecessarily prolong such proceeding or will result in inadequate exposition of factual or legal matters.

represented by (i) its President, Thomas Melone and (ii) its Vice President and General Counsel, Michael Melone.

3. Mr. Thomas Melone is admitted as an attorney, and is in good standing, in the States of New York and New Jersey; has practiced law at the law firms of Cravath, Swaine & Moore and Hunton & Williams; and has practiced before the Vermont Supreme Court, and other courts and Federal and State regulatory boards, including the FERC, the Massachusetts Department of Public Utilities, the Minnesota Public Utilities Commission, the California Public Utilities Commission and the Iowa Utilities Board. Mr. Thomas Melone is also on the Board of Advisors of the Institute for Policy Integrity at New York University School of Law.
4. Mr. Michael Melone is admitted as an attorney, and is in good standing, in the State of New York; has practiced law at the law firms of O'Melveny & Myers and Morgan, Lewis & Bockius. Mr. Michael Melone is a graduate of Middlebury College in Vermont and New York University School of Law.
5. The participation of Petitioner's *pro se* representative will not unnecessarily prolong these proceeding and will not result in inadequate exposition of factual or legal matters.

III. THE CHELSEA SOLAR PROJECT.

6. The Chelsea Solar Project is a proposed 2.0 megawatt (MW) solar electric generation project to be located on a portion of a 27± acre undeveloped parcel of land located at 500 Apple Hill Road in Bennington, Vermont. The parcel has a general North to South slope, enhancing its value as a site for solar electric production.
7. The nameplate capacity of the Project is 2.0 megawatts (MW) AC. The expected net energy output of the Project is 3,538± megawatt hours of electricity (MWh) (3,538,000 kWh) per year. This is the equivalent of the annual electricity

consumption of roughly 330 homes, based upon the average residential electricity use in Vermont.¹

8. The Project is being developed under the "Standard Offer" program. The Standard Offer contract was executed on June 20, 2013 with the SPEED Facilitator. The Standard Offer contract provides for the sale of the Project's output and other attributes (such as renewable energy credits), at a fixed price of \$0.134/kWh for a period of 25 years.
9. The Chelsea Solar Project, as a renewable energy resource, would contribute to the State meeting its energy and sustainability goals, which include, by the year 2025, to produce 25 percent of the energy consumed within the state through the use of renewable energy sources, particularly from Vermont's farms and forests.
10. Chelsea Solar will also contribute positively to the local and State economy through the use of in-state suppliers, contractors, and consultants, and the payment of local and state property taxes.
11. The Project's equipment consists of the following: individual polycrystalline solar photovoltaic panels, a metal support structure under the panels to create south-facing collector arrays, electrical lines in underground conduit connecting the panels to the inverters and switch gear enclosure, and underground electrical lines from the interconnection transformer to the GMP distribution system. The individual panels making up each solar array are anticipated to be approximately 305 watts each (depending upon the final selection of a solar installer and panel manufacturer).

While each panel may be somewhat less or more than 305 watts, the total project

¹Figure based on upon statewide average usage of 750 kWh/month. See http://publicservice.vermont.gov/Consumer/Cons_alerts_electric.html.

size will not exceed 2.2 MW (AC) as required under the Standard Offer program, and the Project's footprint will not materially change.

12. The project will use 72 cell 305-watt solar modules. The modules will be attached to a fixed mounting system composed of steel and aluminum support pieces. The mounting structure will be arranged in east to west rows with panels placed two high in landscape on each row. The panels will be tilted at 30 degrees and will face solar south (195 degrees magnetic).
13. Inverters will convert the DC current generated by the solar panels into AC current. Four 500 kW inverters will be housed in a single small pre-fabricated enclosure central to the site. All electrical conduits and lines will run underground from the solar panels to the inverter enclosure. A medium voltage transformer adjacent to the inverter enclosure will convert the 480-volt AC inverter output to 12 kV for interconnection to the Green Mountain Power system.
14. In support of this Petition, Chelsea Solar submits testimony and exhibits that address each of the § 248 (b) criteria.

Request for Relief

WHEREFORE, Chelsea Solar respectfully requests this Board to:

- A. Hold a preheating conference as expeditiously as possible on the Petition;
- B. Hold technical hearings, if the Board determines such hearings are necessary;
- C. Render a decision on this Petition no later than late 2014;
- D. Make findings as required by 30 V.S.A. § 248 finding that Chelsea Solar shall be authorized to construct and operate a 2.0 MW solar electric generation facility located at 500 Apple Hill Road in Bennington, Vermont, and that the Project will promote the general good of the State of Vermont, and authorize Chelsea Solar to undertake the actions described herein and in the attached testimony and exhibits and issue a Certificate of Public Good to that effect; and
- E. Take such other action as may be required for the expeditious review and approval of this Petition.

DATED 19th of June, 2014.

Michael Melone, Esq.
General Counsel and Vice President of Allco Renewable Energy
Attorneys for Petitioner Chelsea Solar LLC

By:



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