

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Chelsea Solar LLC, pursuant to 30)	
V.S.A. § 248, for a certificate of public good)	Case No. 17-5024-PET
authorizing the installation and operation of the)	
“Chelsea Solar Project,” a 2.0 MW solar electric)	
generation facility located off Willow Road in)	
Bennington, Vermont)	

**PETITIONER’S RESPONSES TO
ANR’S SECOND SET OF INFORMATION REQUESTS**

Q.ANR:Chelsea.2-1. Brad Wilson, in his response to the Agency’s first set of questions concerning an alternate O&M access drive, indicated that access “would be obtained by traveling over the adjacent property in its current condition,” and that construction of an improved access drive “is not proposed.” Please answer the following with respect to the alternate O&M access:

- a. Explain how rutting will be prevented if the vehicles described in Mr. Wilson’s responses need to cross the adjacent property under wet (i.e., saturated soils) or muddy conditions?

Response: If the use of the alternative gate is required by the PUC, then vehicles needing to cross the adjacent property for O&M purposes would avoid areas saturated enough to result in significant rutting or stuck-vehicle situations. That could be accomplished by using a route across the property where the soil is less saturated, by delaying a site visit until the soil is less saturated, or by parking larger vehicles at the northeastern corner of the adjacent property and then either walking to the solar project or driving smaller vehicles like lawn tractors or ATVs. Alternatively, a path covered with wood chips may be used in such conditions. If these options prove to be unworkable in practice, Petitioner will consult with the Agency prior to constructing any improved access drive.

- b. Explain how vehicles described in Mr. Wilson’s responses will gain access across the adjacent property when the ground is snow covered.

Response: If the use of the alternative gate is required by the PUC, vehicle access would be obtained by utilizing vehicles that are equipped for such conditions; i.e. four-wheel drive, snow tires, etc. Plowing or snow blowing on the adjacent property may be necessary in some situations. There is also the option to park larger vehicles at the northeastern corner of the adjacent property and then either walking to the solar project or driving smaller vehicles like lawn tractors or ATVs. If these options prove to be unworkable in practice, Petitioner will consult with the Agency prior to constructing any improved access drive.

- c. Will snow plowing be performed on the adjacent property to allow for O&M access? If so, how will you ensure that the ground surface (including vegetation and roots) will not be disturbed?

Response: If the use of the alternative gate is required by the PUC, snow plowing would not be regularly scheduled but perhaps would be necessary in some situations. In these cases, the plow height would be set at least two inches above the ground surface so that the plow is not making regular direct contact with the ground.

- d. Have you considered whether an improved access drive across the adjacent property might be proposed at some time in the future? If yes, please explain.

Response: The Petitioner has no plans to propose an improved access drive across the adjacent property at some time in the future unless necessary. If necessary, Petitioner will consult with the Agency prior to constructing any such improved access drive.

- e. Describe how the Project would be accessed for O&M activities if, after the Project is built, you discover that the vehicles described by Mr. Wilson are unable to access the O&M gate located along the eastern fence year-round under all weather and ground conditions without an improved access drive.

Response: Petitioner is aware that a wide selection of equipment and technologies exist for allowing residential, commercial, and agricultural-type maintenance vehicles to travel across property that does not contain an improved access driveway. In addition to utilizing different types of equipment that conditions may require, O&M personnel could utilize a less-impeded route across the adjacent property, reschedule maintenance

visits to a later time when the adjacent property is not impeded, or simply walk across the adjacent property rather than drive.

If these options prove to be unworkable in practice, Petitioner will consult with the Agency prior to constructing any improved access drive.

It bears repeating that the Petitioner prefers and fully intends to access the Project from the south via an improved driveway connected to Willow Road. The Petitioner would only utilize the alternate access gate if the PUC deems it necessary to require the Petitioner to do so.

Person responsible for response: Brad Wilson