

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Salisbury AD 1, LLC for a Certificate	)	
of Public Good, pursuant to 30 V.S.A. § 231, to	)	
own and operate a renewable natural gas facility	)	
in Salisbury, Vermont, and for de minimis	)	Case No. 18-3449-PET
regulation, and to address motions to transfer and	)	
amend the 30 V.S.A. § 248 CPG for the facility	)	
that was issued in Case 8596	)	

THIRD AFFIDAVIT OF MARIA SOL UCCIANI

1. My name is Maria Sol Ucciani.
2. I previously filed affidavits in support of Salisbury AD 1, LLC's ("SAD1") motion to amend the 30 V.S.A. § 248 Certificate of Public Good ("CPG") issued by the Vermont Public Utility Commission ("PUC" or "Commission") in Docket No. 8596, for a renewable natural gas facility to be located on the Goodrich Farm in Salisbury, Vermont (the "Project") on October 4, 2018 and December 12, 2018. The Project will consist of an anaerobic digester tank system that produces biogas, as well as gas upgrade and purification equipment that refines the biogas into the finished renewable natural gas ("RNG") product.
3. The purpose of my third Affidavit is to:
 - (i) provide updated versions of the Site Plan, Comparison Plan, and EPSC Plan;
 - (ii) provide an update on collateral permits that have been applied for;
 - (iii) correct or update several items in my prior affidavits and exhibits;
 - (iv) summarize proposed conditions for the gas components of the Project, based upon consultation with the Department of Public Service ("DPS" or "Department"); and
 - (v) provide the Town of Salisbury's amended Solid Waste Implementation Plan;
4. SAD1 has continued to engage informally and formally with ANR, AAFM, and DPS concerning the revised Project. This has included SAD1 providing responses to discovery from all three agencies, dated January 23, 2019.
5. As an outgrowth of the discovery process with ANR, SAD1 has made modifications to the previously filed Revised Site Plan in order to shift the proposed water well approximately 90 feet

to the south. In addition, the site plans were revised to accurately show the Project's lease area. The 2nd Revised Final Site Plan and Comparison Plan are included in the attached Exhibit SAD1-3(Rev.2).

6. Relatedly, VHB has revised the EPSC Plans to incorporate the above-referenced changes. The EPSC Plan has also been prepared in conjunction with the Construction Stormwater Permit Application. The revised EPSC Plans are included in Exhibit SAD1-3(Rev.2).

7. SAD1 has applied for a number of additional collateral permits since I filed my last affidavit in December. A summary of all permits applied for is as follows:

Permit	Submittal Date
Solid Waste Certification	11/20/18
Construction and Operating Air Permit	11/21/18
Construction Phase Stormwater Discharge Permit (INDC)	1/18/2019
Operational Phase Stormwater Discharge Permit (GP 3-9015)	1/18/2019
Vermont Wetland Permit (GP 3-9025 authorization or individual permit)	1/25/2019
CWA Section 404/ RHA Section 10 (USACOE, New England)	1/29/2019
Wastewater/Water Supply Permit	1/28/2019

8. In my 12/12/18 Affidavit at paragraph 7, I stated that the nutrient storage tanks would be hydro-tested for leaks. Upon further consultation with the tank vendor, I now understand that after construction, a certified inspection of the tanks will be conducted by the vendor and designing engineer.

9. In my 10/04/18 Affidavit at paragraph 54, I stated that a portion of the Project's RNG will be sold to Middlebury College, "which will use it in place of the No. 6 heating oil currently used in its campus boilers." It is now my understanding that the College has been burning Natural Gas from the pipeline since 2017.

10. Exhibit SAD1-22 (Digestate Management Plan) states that: “It is anticipated that the [Goodrich Farm Large Farm Operating (“LFO”) Permit] amendment application would be prepared and submitted a year prior to the farm using either the liquid nutrient or nutrient cake from the Project, or at a timeline agreed upon between the farm and AAFM.” As stated in our discovery responses to AAFM, I have since confirmed with the Goodrich Farm that it intends to begin the LFO permit process right after the section 248 amended CPG is granted and construction of the Project has started. SAD1 believes this is a reasonable approach, given that all of the time, effort, and expenditures associated with preparing and filing the LFO permit amendment application would not need to be incurred by the Farm if the Project does not move forward.

11. SAD1, Vermont Gas Systems (“VGS”), and the DPS have engaged in discussions concerning the gas-related components of the revised Project. The DPS has requested that SAD1 incorporate the SAD1/VGS discovery responses into the evidentiary record. Those discovery responses are attached hereto as Exhibit SAD1-23.

12. Based upon the discussions with the DPS and its specific requests concerning the gas components of the Project, SAD1 (in consultation with VGS) confirms the following:

- i. Pipeline from the gas cleaning equipment to the VGS M&R Station
 - VGS will provide operational assistance, consisting of performing periodic inspections (leak survey, dig safe, corrosion control) and testing as required by 49 CFR 192 Subpart O (gas transmission integrity management) and other relevant subparts.
 - VGS intends that the contractor installing this equipment and distribution mains will follow VGS’s specifications and procedures.
 - VGS will assist SAD1 and/or SAD1’s consultant in preparing a Transmission Integrity Management Program (TIMP) and related documents. See responses to Q.DPS:PET.1-11, 12 and 14 for a discussion of TIMP, in Exhibit SAD1-23.
 - VGS anticipates that the pipeline will be a 4” steel pipe protected by a galvanic cathodic protection system which VGS will periodically test under the terms of a mutually-agreed upon Operating Agreement. See responses to Q.DPS:PET.1-11, 12 and 14 for a discussion of TIMP, in Exhibit SAD1-23.

- VGS anticipates that the pipeline will operate at less than 20% Specified Minimum Yield Strength (“SMYS”) and will be constructed and operated as if in a Class 3 area. See response to Q.DPS:PET.1-11 for a discussion of TIMP, in Exhibit SAD1-23.
- ii. VGS M&R Station
- VGS will have dual regulator runs and utilize a slam shut valve for secondary over pressure protection.
 - VGS will install an odorant station to comply with distribution odor requirements.
 - VGS will install separate gas chromatograph and on-line containment testing equipment within the M&R station in addition to the SAD1-installed equipment in the gas cleaning building.
 - VGS will have the gas quality testing equipment outputs sent to VGS Gas Control via telemetry.
 - VGS will furnish the DPS with a gas quality plan before construction of gas-related components of the Project, with a preliminary plan provided as soon as March 2019.
 - VGS will use the slam shut valve to isolate the distribution system in the event that out-of-specification gas is discharged from the SAD1 gas cleaning equipment.
 - VGS’s current plan is to have the underground portion of the Project completed by November 2019 and have the M&R station fully operational by January 2020, subject to the timing of the final order and SAD1’s construction schedule.

See also Affidavit of Thomas Murray, VGS.

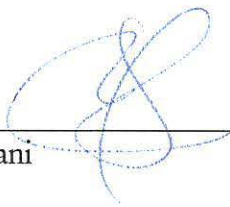
13. The understandings in the preceding paragraph will be reflected in SAD1’s Proposed Findings of Fact and Order, which will be filed with the Commission in the near future.

14. Based upon discussions with the DPS and its specific requests concerning the gas components of the Project, SAD1 has agreed to the following CPG conditions, which will be reflected in its Proposed CPG that will be filed with the Commission in the near future (please note that these supersede proposed gas-related CPG conditions in SAD1’s prior filings):

- i. The pipeline between the gas cleaning equipment and Vermont Gas Systems’ (“VGS”) Metering & Regulation Station (“VGS M&R Station”) shall meet the following specifications:

- ii. The pipe shall meet all transmission requirements per 49 CFR Part 192 for design, testing, operations and maintenance.
 - iii. The pipe shall not operate at greater than 50% SMYS and shall be hydrostatically tested to at least 1.5 times the MAOP or at least 330 psi, whichever is greater.
 - iv. The pipe shall be considered as located in a High Concentration Area (HCA) and as such shall meet all of the additional requirements per 49 CFR 192 Subpart O. Because this transmission line operates below 30% SMYS, the operator may use the reassessment method described in 49 CFR § 192.941.
 - v. The CPG Holder, in conjunction with VGS, shall be responsible for the testing, maintenance, and operation of the pipe pursuant to the applicable subparts of 49 CFR Part 192, including Subpart B (Materials), Subpart C (Pipe Design), Subpart D (Design of Pipeline Components), Subpart E (Welding of Steel in Pipelines), Subpart G (General Construction Requirements), Subpart I (Corrosion Control), Subpart J (Testing), Subpart L (Operations), Subpart M (Maintenance), and Subpart N (Qualification of Pipeline Personnel).
 - vi. All of the applicable industry standards as referenced by US DOT PHMSA shall also be followed, using the edition or version as specified in 49 CFR Part 192.
 - vii. The CPG Holder shall prepare and implement, in conjunction with VGS, a quality control program for installation and operation of the pipe. The Plan shall specify: (i) how the pipe will be monitored and its quality controlled; (ii) the API standards that will be used; (iii) how welders will be qualified; and (iv) how gas quality will be monitored and controlled to ensure it meets minimum standards for moisture and other contaminants and prevents them from traveling down the pipe to the VGS M&R station.
 - viii. No later than two weeks prior to interconnection of the RNG facility with VGS's natural gas distribution pipeline system, the CPG Holder shall file with the Commission and all parties a Quality Assurance Plan ("Plan") that identifies the fuel substrates in use and the associated potential gas contaminants. The Plan shall be subject to approval of the Vermont Department of Public Service ("Department"). The Plan shall also provide for notification to the Department and the Vermont Agency of Agriculture, Food, and Markets ("AAFM") of any changes in fuel source usage.
 - ix. No later than two weeks prior to interconnection of the RNG facility with the VGS system, the CPG Holder shall, in coordination with VGS, provide the Department with a copy of the VGS Gas Quality Plan.
15. On January 8, 2019, the Town of Salisbury amended its Solid Waste Implementation Plan to include the SAD1 Facility. See Exhibit SAD1-24.

I, Maria Sol Ucciani, do hereby swear and affirm under the penalty of law that the information provided in my affidavit is accurate to the best of my knowledge and that I have personal knowledge of, and am able to testify as to the validity of the information contained in my testimony and attached exhibits.



Maria Sol Ucciani

STATE OF Massachusetts)
COUNTY OF Norfolk)

The foregoing instrument was signed and acknowledged before me this 5 day of February, 2019 at 16 Laurel Ave, Wellesley MA by Maria Sol Ucciani, who acknowledged the act to be her free act and deed.



Notary Public

Name of Notary: Maura Shoulkin

Commission Expires: March 2, 2023

