

**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	)	

FOURTH 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, December 12, 2018, and February 6, 2019.
3. The purpose of my fourth Affidavit is to provide a Stipulation reached with the Agency of Natural Resources (“ANR”) and the Agency of Agriculture, Food & Markets (“AAFM”), to inform the Commission about timing issues with respect to Project Construction, and to respond to one of the Hearing Officer’s requests for information in the Procedural Order dated February 7, 2019.
4. SAD1 has entered into a Stipulation with ANR and AAFM, attached hereto as Exhibit SAD1-25. The Stipulation, which resolves all issues in this proceeding raised by ANR and AAFM, includes proposed CPG conditions related to: collateral permits, wetlands, blasting, waste disposal, the nutrient storage tanks, spill prevention and cleanup, on-site management of Project feedstocks, on-site and off-site management of nutrient effluents (liquid and solid), and future site visits.
5. In light of SAD1’s Stipulations with Vermont Division for Historic Preservation and ANR-AAFM, and the specifications and proposed CPG conditions pertaining to the Project’s gas pipeline and related components that were vetted with the Department of Public Service (see my 3rd

Affidavit), SAD1 believes that all outstanding issues raised by the agencies for the Revised Project have been resolved.

6. Hearing Officer Question 3: *During the November 20, 2018, status conference, I asked the Petitioner to provide the location of the three additional farm lagoons that are proposed to be used for liquid digestate storage. I also asked if transport of liquid digestate to those lagoons would require use of public roads or would occur entirely on farm roads. The Petitioner responded that the transportation would be limited to farm roads. The Petitioner subsequently filed exhibit SAD1-21, depicting the location of the three additional waste lagoons to be used for the Project. Two are located north of the Project site on Shard Villa Road, and one is located northeast of the Project site on Middle Road, which appears to be accessible from the Project site via Shard Villa Road or Columbus Smith Road and Middle Road. The Petitioner also addressed some of its anticipated trucking estimates in responses to discovery filed on January 24, 2019. This includes the potential for up to one truckload per day (Monday through Friday) of excess effluent to a certified disposal facility located elsewhere in the state, such as Middlebury, Brattleboro, or Coventry. The Petitioner is directed to clarify its Project-related traffic estimate to address the anticipated number of truck trips to/from the site for fuel deliveries, transport of liquid digestate on area roads to the Project's storage lagoons, transport of excess effluent to a certified waste disposal facility, and any other trucking or transportation needs anticipated for operation of the Project.*

Response: To estimate the number of trucks the Revised Project will create, trucking was classified into three categories: trucks bringing in food waste; trucks taking nutrient cake from the Project site; and farm trucks receiving liquid digestate that are only as a result of the Project. Tables 1 - 3 below show the calculations for the different categories in estimated trucks per day based on a Monday to Saturday trucking week and in trucks per year. Given seasonality of farm activities it becomes extremely complicated to predict a number of trucks per day associated with this; therefore, the total trucks per year number is believed to be more accurate.

In summary, the Revised Project expects to see an average of 11 trucks per day on the roads (or 3,991 trucks per year), which represents an overall decrease from the As-approved Project (7,248 trucks shown in table 3).

Table 1: Changes in farm related traffic estimates		
Current Manure handled by farm*	gallons/year	8,708,535
	# Trucks/year	967.62
Liquid digestate produced by AD system	gallons/year	17,860,910
	# Trucks/year	1984.55
Increase in farm trucking digestate from non-AD farm	trucks/year	1016.93
Average daily increase in farm trucking**	trucks/day (Mon-Sat)	3.90

Table 2: Foodwaste deliveries/Nutrient Cake Export		
Foodwaste volume into AD per week	gallons/week	302,400
Number of foodwaste trucks per day	truck/day (Mon-Sat)	5.6
Nutrient cake trucks	truck/day (Mon-Friday)	1
Total number of trucks of foodwaste delivery and nutrient cake export	truck/day (Mon-Sat)	6.6

Table 3: Total number of trucks comparison to as-approved project		
Total number of trucks related to AD project (from table 1 and table 2)	trucks/day**	11
	trucks/year (Mon-Sat)***	3391
As-Approved project truck deliveries	trucks/day	20
	trucks/year (Mon-Sat)	7248

Reference values

Volume of liquid per truck	gallons	9000
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* number based on 900 cows whose manure is now going into the AD system that would not be trucked by the farm as raw manure any longer

** Calculation based on equal distribution of trucks per season. The maximum number would be limited to the 20 trucks/day as in the previously approved project.

*** Nutrient cake would not be transported off site on Saturdays however foodwaste deliveries would happen. This calculation takes into account that difference, so the number is not counting nutrient trucks on Saturdays.

With respect to the type of roads (public or private) that the trucks will travel on, SAD1 understood the Hearing Officer's question at the November status conference to be whether the off-site lagoons were accessible via farm roads. The lagoons themselves are accessed via farm roads, but driving on public roads from the Project site would be required to access the farm roads that lead to the lagoons.

Thus to clarify, all of the truck traffic bringing food waste to the Project and taking nutrient cake from the Project will be both on public roads and on farm roads. Farm trucks receiving liquid digestate will use either public roads or farm roads, depending upon where on the farm the digestate is being taken for spreading.

Timing of Project Construction

7. As I have previously informed the Commission, in order to commence construction of the Project and become fully commissioned and delivering RNG by July 2020, SAD1 is requesting a CPG by March 15, 2019. This date is driven by the need to do final engineering and place orders (with substantial deposits) on equipment that will be needed by both SAD1 and VGS, and to commence construction as early this spring as possible.

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 7 day of February, 2019 at Wellesley, MA by Maria Sol Ucciani, who acknowledged the act to be her free act and deed.



Notary Public

Name of Notary: Maura B. Shoulkin

Commission Expires: March 2, 2023

