

**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
authorizing the installation and operation of the	)	
“Willow Road Project,” a 2.0 MW solar electric	)	
generation facility located off Willow Road in	)	
Bennington, Vermont		

**AFFIDAVIT OF STEVEN SENECA
RE: ACCESS TO PROJECT PARCEL**

NOW COMES Steven Senecal, and under oath does depose and swear as follows:

1. My name is Steven Senecal, son of Earl Senecal.
2. My father, Earl Senecal lived at 133 Russet Drive, Bennington, Vt.
3. My father was a member of the Apple Hill Homeowners Association because his property is located in the Apple Hill residential development.
4. My father passed away in January, 2019 at the age of 95.
5. I was named as my father’s Executor in his Last Will and Testament.
6. My father’s property in Apple Hill residential development is at the end of Russet Drive on the west side of the road shown on Exhibit PC 156, p. 8 of the PUC’s Procedural Order Re Additional Briefing issued February 14, 2019.
7. At no time has Thomas Melone or Michael Melone or anyone else representing Allco Renewable Energy; Ecos Energy; PLH LLC; Chelsea Solar, LLC; Apple Hill Solar, LLC; Bennington Solar, LLC; Willow Road Solar, LLC been given the right to cross my father’s property or build a road over my father’s property, not now and not when Exhibit PC 156 drawing was created.

8. To the contrary, on or about 2013, my father was approached by someone representing the solar project who wanted to purchase an easement or right-of-way across my father's land to serve as an ingress/egress to the Project parcel. My father refused to convey any type of property interest.

9. My father's property is not burdened by any easement for ingress/egress benefiting the Project parcel.

10. My father did not grant a license or given any other permission for temporary rights to ingress/egress the Project property across my father's land.

11. The covenants of Apple Hill Homeowners Association do not permit the commercial use of the lands within the association.

12. Until today, I had never seen Exhibit PC 156 or any similar rendition of a road crossing my father's property to access the Project property.

DATED this 27th day of February, 2019.

By: Steven Senecal
Steven Senecal

STATE OF NEW YORK
COUNTY OF Chenango, ss

At NBT BANK in said County and State of New York,
this 27th day of February, 2019, personally appeared Steven Senecal and made oath to the truth of the statements set forth herein.

Before me, Kimberly R. Walker

Notary Public

My Commission Expires:

6/14/19