

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Investigation pursuant to 30 V.S.A. §§ 30 and	)	Case No. 20-1611-INV
209 into whether the petitioner initiated site	)	
preparation at Apple Hill in Bennington,	)	
Vermont, for electric generation in violation	)	
of 30 V.S.A. § 248(a)(2)		

AFFIRMATION OF THOMAS MELONE
IN OPPOSITION TO ANR’S REQUEST FOR A TEMPORARY RESTRAINING ORDER

I, Thomas M. Melone, hereby declare and affirm under penalty of perjury:

1. I am the President of Allco Renewable Energy Limited (“Allco”). I represent PLH Vineyard Sky LLC, Apple Hill Solar LLC and Chelsea Solar LLC in the above-captioned matter. The facts set forth herein are based on my personal knowledge and if called as a witness I could competently testify thereto. This declaration is being provided in opposition to the Agency of Natural Resources request for a temporary restraining order.

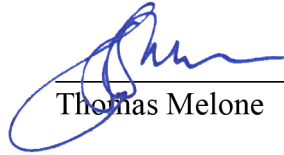
2. I am an attorney in good standing licensed to practice law in the states of New Jersey and New York for approximately thirty-six years. I am also an attorney in good standing licensed to practice law in the states of Massachusetts, Florida, Connecticut, Pennsylvania and Vermont. I have extensive experience as outside counsel in tax, energy and finance, including seven years practicing law with Cravath, Swaine & Moore in New York. I am currently a member of the litigation committee of the Board of Advisors of the Institute for Policy Integrity at New York University School of Law. I received my Juris Doctor with high honors from Rutgers Law School - Newark in 1983, my Master of Laws (LLM in taxation) from New York University School of Law in 1989 and my Certified Public Accountant certificate in 1980.

3. The site clearing activities (the “Clearing Activity”) underway at the parcels located in Bennington Vermont, one of which is proposed to be the location of solar facilities described in docket 8454 and case 17-5024, have nothing to do with those proposed solar facilities.

4. The Clearing Activity is being undertaken solely for the purpose of enabling the landowner, PLH Vineyard Sky LLC, to engage in agricultural activities related to sheep farming and hemp growing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 25, 2020



Thomas Melone