

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of MHG Solar LLC for a certificate	)	
of public good, pursuant to 30 V.S.A. §§	)	
8010 and 248, to install and operate a 500	)	
kW group net-metered solar electric	)	Docket No. 20-1261-NMP
generation facility in Manchester, Vermont	)	

**MOTION TO INTERVENE**

NOW COMES the Vermont Division for Historic Preservation (“VDHP”), by and through its counsel, pursuant to Vermont Public Utility Commission (the “Commission” or “PUC”) Rule 2.209 (B) and respectfully moves the Commission for permission to intervene in this proceeding. In support of the Motion, the VDHP submits the following Memorandum of Law.

**MEMORANDUM OF LAW**

The VDHP, part of the Department of Housing and Community Development within the Agency of Commerce and Community Development, is the relevant state entity responsible for reviewing matters concerning historic sites arising under 30 V.S.A. § 248(b)(5) and under Section 106 of the National Historic Preservation Act.

PUC Rule 2-209(B) provides in pertinent part:

Upon timely application, a person may, in the discretion of the Commission, be permitted to intervene in any proceeding when the applicant demonstrates a substantial interest which may be affected by the outcome of the proceeding. In exercising its discretion in this paragraph, the Commission shall consider (1) whether the applicant’s interest will be adequately protected by other parties; and (3) whether intervention will unduly delay the proceeding or prejudice the interests of existing parties or of the public.

The DHP has substantial interests which may be affected by the outcome of this proceeding. The VDHP's interests will not be adequately protected by any other party to this proceeding, and the VDHP has no other way to protect its interests at stake in this proceeding.

The VDHP's intervention will not unduly delay the proceeding or prejudice the interests of any existing party or the public.

For the foregoing reasons the Commission should grant the VDHP's intervention as of right under PUC Rule 2.209(A). In the alternative, the Commission should exercise its discretion and allow the VDHP's permissive intervention pursuant to PUC Rule 2.209(B).

DATED at Richmond, Vermont, this 26 day of June, 2020.

/s/ Maxwell Krieger  
Maxwell Krieger, Esq.  
General Counsel  
Department of Housing and Community  
Development