

**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 <i>de minimis</i> regulation,	)	Case No. 18-3449-PET
and to address motions to transfer and amend the	)	
30 V.S.A. § 248 CPG for the facility that was	)	
issued in Docket 8596	)	

MOTION TO AMEND CERTIFICATE OF PUBLIC GOOD

CPG Holder Salisbury AD 1, LLC (“SAD1”) moves the Public Utility Commission (“PUC” or “Commission”) to amend the Certificate of Public Good (“CPG”) previously issued for SAD1’s Salisbury Renewable Natural Gas Facility (the “Project” or “Facility”) in Case No. 18-3449-PET in order to incorporate a number of necessary Project design changes.

I. Introduction

On April 8, 2016, the Commission granted Lincoln Renewable Natural Gas, LLC (“Lincoln RNG”) a Certificate of Public Good in Docket 8596 to construct and operate an anaerobic digester at the Goodrich Farm at 592 Shard Villa Road in Salisbury, Vermont.

On March 14, 2019, the Commission granted an Amended CPG to SAD1 in Case No. 18-3449-PET (the “As-Approved Project”) following a review of the amended Project under 30 V.S.A. §248(j).

SAD1 has since begun construction of the Project in August of 2019. In the natural course of finalizing construction plans and equipment orders, SAD1 has recognized the need to make a number of changes to the Project design, largely relating to equipment specifications. While these changes are relatively minor, some changes have potential for additional impacts under certain Section 248 criteria or require language changes to the current CPG conditions. As a result, SAD1 is submitting this motion in order to seek Commission approval of proposed changes that would be

deemed material or substantial. In addition, SAD1 is providing notice of other minor changes that it believes do not rise to the level of material or substantial. None of the changes—whether material/substantial or non-material/non-substantial—will result in any undue adverse impacts under Section 248 criteria.

SAD1 therefore requests that the Commission issue an amended CPG order that incorporates these Project design changes.

II. Motion to Amend CPG

Pursuant to Condition 1 of the Amended Project CPG¹ and Commission Rule 5.408, SAD1 submits this motion to request approval for certain modifications to the As-Approved Project's physical layout and equipment specifications. The accompanying affidavit of Maria Sol Ucciani explains each change in detail and confirms that they will not have a significant impact under the relevant Section 248 criteria or on the general good of the State. In addition, the affidavit includes the following exhibits:

- Overview chart of proposed changes to Project (*Exhibit SAD1-MTN-1*);
- Revised Site Plan and Comparison Site Plan (*Exhibit SAD1-MTN-2*);
- Draft Amendment to Air Permit (*Exhibit SAD1-MTN-3*);
- Memorandum from Lydia Lee, VHB (*Exhibit SAD1-MTN-4*); and
- Updated equipment specifications (*Exhibit SAD1-MTN-5*).

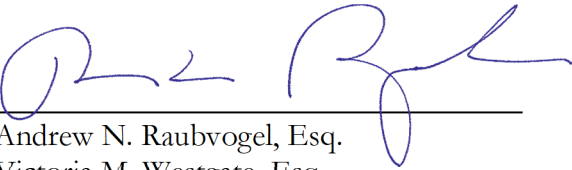
¹ “Construction, operation, and maintenance of the Amended Project shall be in accordance with the plans and evidence submitted in this proceeding. Any material deviation from these plans or a substantial change to the Amended Project must be approved by the Commission. Failure to obtain advance approval from the Commission for a material deviation from the approved plans or a substantial change to the Amended Project may result in the assessment of a penalty pursuant to 30 V.S.A. §§ 30 and 247.”

Based on this evidentiary support, SAD1 respectfully requests that the Commission issue an amended CPG for the Project incorporating these final design changes to the Project plans as expeditiously as possible so that the Project may proceed on its current schedule given the ongoing but limited construction season and delays already suffered due to the COVID-19 crisis. To this end, SAD1 proposes that the Commission set July 24th as the deadline for other parties to comment on the motion, with SAD1 providing a response to comments, if needed, by July 31st. **SAD1 requests a final order approving this motion by August 14th.**

SAD1 greatly appreciates the Commission's attention to this request and all efforts to issue a decision by mid-August so that SAD1 may install the remainder of the Project equipment this year.²

Dated at Burlington, Vermont, this 7th day of July, 2020.

SALISBURY AD 1, LLC

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² SAD1 may commence filling the biodigester (a step that occurs much earlier than the commencement of commercial operations) during the pendency of this motion to amend, provided it can meet all applicable CPG conditions, including providing the pre-digester-operation notice to the Commission and parties.