

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of Norwich Turnpike Solar, LLC for a	)	
certificate of public good pursuant to 30 V.S.A.	)	
§§ 248 and 8010, authorizing the installation	)	Docket No. 20-1655-NMP
and operation of a 150 kW group net-metering	)	
solar system in Norwich, 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, VDHP submits the following Memorandum of Law.

**MEMORANDUM OF LAW**

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.

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

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 exercise its discretion and allow VDHP's permissive intervention pursuant to PUC Rule 2.209(B).

DATED at Richmond, Vermont, this 24 day of July, 2020.

/s/ Maxwell Krieger  
Maxwell Krieger, Esq., General Counsel  
Department of Housing and Community Development  
Division for Historic Preservation