

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-1655-NMP

Petition of Norwich Turnpike Solar, LLC for a certificate of public good pursuant to 30 V.S.A. §§ 248 and 8010, authorizing the installation and operation of a 150-kW group net-metering solar system in Norwich, Vermont

**THE DEPARTMENT OF PUBLIC SERVICE’S COMMENTS REGARDING
THE PETITION OF NORWICH TURNPIKE SOLAR, LLC
FOR A CERTIFICATE OF PUBLIC GOOD**

The Department of Public Service (“Department”) has reviewed Norwich Turnpike Solar, LLC’s (“Petitioner”) application for a Certificate of Public Good (“CPG”) in this matter and states as follows¹:

On June 26, 2020, the Petitioner filed an application with the Public Utility Commission (“Commission”) for a CPG under 30 V.S.A. §§ 248 and 8010. The Petitioner seeks to install and operate a 150-kW group net-metered photovoltaic electric generation system to be located off of 645 Turnpike Road in Norwich, Vermont (“Project”). On June 26, 2020, the Commission deemed the petition to be administratively complete.

The Project is located on the southern end of a larger 8.5-acre parcel and setback approximately 112 feet from Turnpike Road. The solar panels will be on a fixed-tilt racking, anchored to the ground using purpose-built posts. The Project will have multiple rows of solar panels, twelve (12) string inverters with a capacity of 12.5-kW each, underground electric cable in conduit connecting the panel rows, string inverters, AC combiner panel and AC disconnect pedestal, a 150-kVA pole-mounted transformer on a GMP distribution pole, and energized equipment rated for outdoor use with locked enclosure covers compliance with NEC code. The Project will be accessed via a new access road off of Turnpike Road.²

The Petitioner asserts preferred site status under Rule 5.103 “Preferred Site” (7) as the Project’s location is designated in a duly adopted municipal plan under 24 V.S.A. chapter 117 for the siting of a renewable energy plant. In support of this designation, the Petitioner submitted letters of support from

¹ The Department’s review typically focuses on preferred site status; orderly development of the region; system stability and reliability; aesthetics and public health and safety; property line setbacks; and Project decommissioning. See Commission Rules 5.103 (definition of preferred sites) and 5.111(B) (specifying that 30 V.S.A. §§ 248(b)(1), (b)(3), (b)(5), (b)(8), and (s) are the statutory criteria that are not conditionally waived when reviewing ground-mounted net-metered solar projects which elect to transfer the renewable energy credits to the interconnecting utility). See also 30 V.S.A. §§ 248 and 8010.

² See Prefiled Testimony of Martha Staskus on Behalf of Norwich Turnpike Solar, LLC, Case No. 20-1655-NMP at 3-7 (June 24, 2020).

the Town of Norwich and the Two Rivers-Ottauquechee Regional Commission.³ The Department concludes the Project will not unduly interfere with the orderly development of the region under § 248(b)(1). This Project will not present an unduly adverse impact on aesthetics and will meet established setback requirements. The Department has not identified an adverse impact on public health and safety stemming from electrical safety risks. Finally, the sound study demonstrates that the installation's noise levels will be within acceptable limits.

The Department has not received any unaddressed comments or concerns from other agencies, municipal or regional entities, or adjoining landowners.

The Department has not received the feasibility study for this Project and is unable to make a final determination with respect to § 248(b)(3). Petitioner notes it will file the feasibility study, pursuant to Rule 5.507(E), once it is issued by GMP. The Department will submit final comments on this criteria upon receipt and review of the feasibility study.

DATED at Montpelier, Vermont this 6th day of August 2020.

Respectfully submitted,

VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Eric B. Guzman

Eric B. Guzman, Special Counsel

112 State Street

Montpelier, Vermont 05620

(802) 828-3785

eric.guzman@vermont.gov

cc: ePUC Service List

³ See Petitioner Exhibit MS-5.