

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Application 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 generation facility) Case No. 20-1261-NMP
located off Richville Road in Manchester,)
Vermont, to be known as the “Richville Road)
Solar Project”)

SUPPLEMENTAL PREFILED TESTIMONY OF THOMAS HAND

August 11, 2020

Summary: Mr. Hand’s testimony addresses the comments filed in Case No. 20-1261-NMP by state agencies and individuals.

1 **Q1. Please state your name, occupation, and business address.**

2 A1. My name is Thomas Hand. I am the founder of MHG Solar, LLC (“MHG”). The principal
3 business address for MHG Solar LLC is 170 Bonnet Street, Manchester Center, VT 05255.

4
5 **Q2. Have you previously submitted testimony in this proceeding?**

6 A2. Yes, I submitted prefiled testimony on behalf of MHG Solar LLC (“MHG”) that was part of
7 the application for the Richville Road Solar Project (“Project”) on May 19, 2020.

8
9 **Q3. What is the purpose of your supplemental testimony?**

10 A3. The purpose of my supplemental testimony is to address certain comments filed via ePUC
11 by the Vermont Agency of Natural Resources (“ANR”), the Department of Public Service
12 (“DPS”), and the Agency of Agriculture, Food and Markets (“AAF”), as well as comments
13 filed by member of the public and by neighbor intervenors who filed motions to intervene in
14 this case. My supplemental testimony also serves to introduce supplemental exhibits related
15 to MHG’s responses.

16
17 **Q4. On June 24, 2020, the ANR filed comments via ePUC requesting MHG revise the site
18 plan to include (a) more information concerning the culvert located to the west of the
19 Project, (b) delineation of the Project’s limits of disturbance, and (c) the contact
20 information for the Manchester Water Department. Has MHG prepared a revised
21 site plan that addresses these issues?**

22 A4. Yes. MHG revised the site plan as requested by the ANR and proves the amended site plan
23 as *Exhibit MHG-TH-2 (Rev.)*.

1 **Q5. ANR, DPS, and AAFM filed comments requesting specific conditions be included in**
2 **any certificate of public good issued in this Case. Does MHG object to the**
3 **requested conditions?**

4 A5. No, MHG does not object to the CPG conditions requested by ANR, DPS, and AAFM in
5 their comments filed on ePUC on or before June, 26, 2020. MHG has incorporated these
6 conditions into a revised proposed Certificate of Public Good provided herewith.

7
8 **Q6. Concerns regarding the aesthetic impact of the Project were raised in the public**
9 **comments filed in this case by Richard Cody and Cynthia Bush and the comments**
10 **included in the motion to intervene filed by Mark Slade, Cosmo Penge, and Timothy**
11 **and Dody Boucher. Do you have a response to those comments?**

12 A6. Yes, I do.

13 The comments filed with the PUC regarding the aesthetic impact of the Project
14 focused on: (1) the Project changing the character of the area; and (2) the adequacy of the
15 Proposed Landscape Mitigation Plan. As acknowledged in *Exhibit MHG-TH-5* (MHG
16 Solar LLC's Response to Comments), the same or substantially similar comments were made
17 during five town meetings held in the Manchester Town Hall during which MHG explained
18 the Project. In response to those comments and the ensuing discussions, MHG engaged a
19 professional landscape architect and aesthetics expert, Lucy Thayer of Trudell Consulting
20 Engineers, to develop a Landscape Mitigation Plan in compliance with the Town's Land Use
21 & Development Ordinance (Section 7.3.5). MHG's initial (pre-application) planting plan
22 was revised to the maximum height of proposed plantings to preserve views to Mount

1 Equinox, as requested by the Manchester Selectboard and Planning Commission. (*see*
2 *Exhibit MHG-TH-4*).

3 The town meetings culminated in the Manchester Selectboard and the Planning
4 Commission granting “Preferred Site” status to the Project.

5 MHG reflected the revisions from the town process into the proposed Landscape
6 Mitigation Plan included with its application to the Commission (*Exhibit MHG-LT-2*). In
7 addition, Ms. Thayer addressed aesthetic issues in the broader context of the Quechee
8 Analysis, as set forth in the Aesthetic Assessment Report filed as *Exhibit MHG-LT-1*.

9 The Landscape Mitigation Plan meets the requirements set forth in the Manchester
10 Land Use & Development Ordinance Section 7.3.5; the draft Manchester Energy Plan
11 (February 18, 2020); and the Town’s specific request during the “Preferred Site” designation
12 meetings to limit the mature tree height to 10-12 feet in order to retain views of the Mt.
13 Equinox Ridgeline. Ms. Thayer’s report describes how the mitigation plantings were
14 selected (type and planting size) to be an effective visual buffer. As I understand it, larger
15 specimens were not chosen due to the poorer survival rate of larger transplanted trees. As
16 such, larger trees would not be cost effective. In addition, the Town requested that the
17 maximum height of the plantings be limited. *Hand PFT at 10-11; Exhibit MHG-TH-4*.
18 MHG has thus taken the available mitigating steps that a reasonable person would take to
19 improve the harmony of the Project with the surroundings.

20
21 **Q7. Does that conclude your testimony at this time?**

22 A7. Yes, it does.