

**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”)

SECOND SUPPLEMENTAL PREFILED TESTIMONY OF THOMAS HAND

December 11, 2020

Summary: Mr. Hand’s testimony addresses a request by the Department of Public Service for additional information concerning the Project’s proposed landscaping.

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, and filed
8 supplemental prefiled testimony on August 11, 2020.
9

10 **Q3. What is the purpose of your second supplemental testimony?**

11 A3. The purpose of my second supplemental testimony is to respond to the Department of
12 Public Service’s (“DPS”) Status Update and Request for Information filed on October 23,
13 2020 and the related memorandum from Environmental Design & Research (the “EDR
14 Memorandum”), and the Request for Status Update issued by the Public Utility Commission
15 on December 8, 2020, concerning the effect of the proposed landscape mitigation plantings
16 on views of nearby mountains. In connection with my testimony, I am providing a line-of-
17 sight analysis, filed as *Exhibit MHG-TH-12*.

18
19 **Q4. Does the line-of-sight analysis provided in *Exhibit MHG-TH-12* address the
20 concerns stated in the EDR Memorandum?**

21 A4. Yes. The question raised by EDR was whether the Project’s proposed landscaping would
22 obstruct scenic views of the Taconic ridgeline as seen from Richville Road. EDR requested
23 either a visual simulation or line-of-site analysis to assess this issue. MHG’s line-of-sight

1 analysis provides three different line-of-sight viewpoints for the proposed landscape
2 mitigation at maturity (20 years). See *Exhibit MHG-LT-2*. The analysis demonstrates that
3 the proposed landscape mitigation at maturity will not obstruct views of the Taconic
4 ridgeline. Likewise, because the landscaping at maturity would not obstruct views, it would
5 also not obstruct views at any earlier time when the landscaping had not reached its mature
6 height. Thus, at no time between installation and maturity will the plantings associated with
7 the proposed landscape mitigation obstruct views of the Taconic ridgeline.

8 Prior to making this filing with the Commission, MHG provided the line-of-sight
9 analysis to DPS. DPS informed MHG that EDR had reviewed the line-of-sight analysis and
10 confirmed that it contained the necessary information for EDR to complete its aesthetic
11 review.

12
13 **Q5. Does that conclude your testimony at this time?**

14 A5. Yes, it does.