

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-0401-NMP

Application of Putney Green AcresSolar LLC,)
pursuant to 30 V.S.A. §§ 248 and 8010, for a)
certificate of public good to install and operate a)
500 kW (AC) solar electric generation facility to be)
located in Putney, Vermont.)

Case No. 21-0651-NMP

Application of Putney Blood Farm 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 (AC) net-metered solar)
electric generation facility in Putney, Vermont)

AFFIDAVIT OF MARTHA STASKUS

1. My name is Martha Staskus. I have personal knowledge of the facts contained in this Affidavit and the exhibits filed with it. The facts and exhibits are true and accurate to the best of my knowledge and belief.

2. I declare that the above statement is true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

3. The facts provided in this Affidavit respond to the Public Utility Commission's February 9, 2021 order for additional information about the development of the Putney Green Acres Solar Project (Case No. 21-0401-NMP) and the Putney Blood Farm Solar Project (Case No. 21-0651-NMP). Pages 2 through 5 of Prefiled Testimony of Martha Staskus filed in Case 21-0651-NMP provides much of the information requested in the February 9, 2021 order and it is hereby incorporated into my Affidavit by reference.

4. A solar panel converts the sun's energy into electricity. A single solar panel that when interconnected to a Vermont utility's electric grid is an electric generation facility and requires a certificate of public good from the Public Utility Commission.

This document has been electronically filed in ePUC.

5. A “solar array” is a grouping of solar panels connected electrically by wiring and combined electrically to be interconnected to an electrical grid. A solar array can be mounted on a roof or it can be mounted on the ground. A ground-mounted solar array can be fixed, or it can track the sun. A fixed ground-mounted solar array is typically laid out in rows of racking that hold the solar panels at a fixed angle to the sun. A solar array is an independent technical facility by design.

6. The Putney Green Acres Solar Project and the Putney Blood Farm Solar Project are two independent technical facilities that will generate renewable energy. The projects are two separate solar arrays proposed for two separate lots of land that are situated on either side of a four-lane interstate highway, I-91, and that do not share any infrastructure or other common facilities. See Exhibit PGAS-MS-2 filed in Case No. 21-0401-NMP, Exhibit PBFS-MS-2 filed in Case No. 21-0651-NMP, and Exhibit PGAS-MS-11 filed with this Affidavit (combined site plan).

7. The host landowner for the Putney Green Acres Solar Project and the Putney Blood Farm Solar Project is Green Acres of Vermont, Inc. This information is included in paragraph 2 of each Petition. Green Acres of Vermont is the former Putney Paper Company.

8. In March 2020, the host landowner’s parent company, APC Paper Company, approached Norwich Technologies about the possibility of selling “[t]he landfill property and a smaller parcel formerly known as the [B]lood [F]arm.” See Exhibit PGAS-MS-12 filed with this Affidavit.

9. In June 2020, Sunny Acres, LLC, a company managed by Norwich Technologies, and the host landowner executed a purchase and sales agreement for the host properties described in the agreement as: “Property address: River Road, Putney, VT 05346 Tax Map Parcels # 080260.1 and #120102 SPAN NO. 504-158-10737 and 504-158-10738. Being +/- 2 acres of vacant land on the west side of I-91 and +/- 20 acres on the east side of I-91.”

10. In September 2020, Putney Green Acres Solar, LLC executed an Option to Lease from Sunny Acres LLC 20± acres of the former Putney Paper landfill property on the east side of Interstate 91 for the purpose of siting a solar array (the “Landfill Site”).

11. In September 2020, Putney Blood Farm Solar, LLC executed an Option to Lease from Sunny Acres, LLC 2± acres of the former Blood Farm property on the west side of Interstate 91 for the purpose of siting a solar array (the “Blood Farm Site”).

12. On July 31, 2020, conversations were initiated with an environmental consulting firm to assist in submitting the Landfill Site and Blood Farm Site into the state’s BRELLA program and to conduct a Phase I ESA on the Landfill Site.

13. On August 31, 2020, I shared the Putney Green Acres Solar preliminary site plan with the Vermont Agency of Natural Resources Department of Environmental Conservation (“VTDEC”) Sites Management Section Hazardous Waste Program.

14. On September 1, 2020, staff from the VTDEC Brownfields Response Program & Sites Management Section and Waste Management and Prevention Division, the Phase I ESA brownfields consultant, and myself began COVID conference calls to discuss the two former Putney Paper Company lots, the different existing conditions on the Landfill Site and the Blood Farm Site, and the separate environmental reviews that would be needed for each site.

15. The Landfill Site is identified as SMS #1994-1606 and has been under the jurisdiction of the VTDEC Solid Waste Management Program, Waste Management & Prevention Division for the last twenty (20) plus years.

16. On September 22, 2020, Arrowwood Environmental was contracted to conduct natural resource inventories on the Landfill Site and Blood Farm Site.

17. On December 3, 2020, the VTDEC Waste Management and Prevention Division, Solid Waste Management Program issued a sanitary landfill certification letter for the Landfill Site.

18. On January 12, 2021, the Blood Farm Site was issued its own identification number, SMS#2020-4993, by VTDEC Sites Management Section Hazardous Waste Program. It also issued a Brownfields Certification letter and a BRELLA program approval letter.

19. On January 29, 2021, the VTDEC Sites Management Section Hazardous Waste Program issued a BRELLA approval letter for the Landfill Site.

20. On December 23, 2020, GMP issued the Feasibility Study results for the Putney Green Acres Solar Project. The Study reports that the Applicant must adjust its inverter settings, pay for the upgrade of approximately 1 mile of existing single-phase line to three phases and the construction of a line extension with PCC recloser. The utility needs to set the substation regulators to co-generation mode. See Exhibit PGAS-MS-7 filed with the Petition in Case No. 21-0401-NMP

21. On February 5, 2021, GMP issued the Putney Blood Farm Solar Project’s Feasibility Study dated February 4, 2021. GMP’s transmittal email stated that the Project “will require a line extension, transformer, inverter requirement and settings all detailed in the conclusion, as well subject to the TGFOV Tariff.” The Study also noted that “[t]here are several upgrades not the responsibility of the project to be done prior to interconnection.” See Exhibit PBFS-MS-10 filed with this Affidavit.

22. On August 18, 2020, drafting began on the preliminary site plans for the Putney Green Acres Solar Project and Putney Blood Farm Solar Project. The preliminary site plan for the Landfill Site was completed on August 21, 2020. That plan was sent with the 45-day advance notice for the Putney Green Acres Solar Project on December 8, 2020.

23. On August 20, 2020, the preliminary site plan for the Blood Farm Site was completed and included in the 45-day advance notice sent on December 8, 2020.

24. On January 13, 2021, the site plan, EPSC plans and elevations were completed by Krebs & Lansing for the Landfill Site.

25. On January 27, 2021 the site plan, EPSC plans and elevations were completed by Krebs & Lansing for the Blood Farm Site.

26. On September 23, 2020, I reached out to the Putney Town Manager, Putney Planning Commission Chair and Putney Select Board Chair introducing the solar projects planned for the Landfill Site and the Blood Farm Site. On October 6, 2020, I introduced the projects to the Planning Commission.

27. On December 22, 2020, I spoke with the Windham Regional Commission Senior Planner to discuss a project under development in the Town of Westminster. The Senior Planner asked me about the two projects in Putney she had seen the 45-day notices for and indicated that she would be adding those projects to the January 5, 2021 Windham Regional Commission ("WRC") Project Review Committee meeting. The WRC was made aware of the Putney projects planned for the Landfill Site and the Blood Farm Site following discussion of the Westminster project, but the Commission did not review or discuss the two Putney projects.

28. I explained in my prefiled testimony in Case No. 21-0651-NMP that I do not expect construction of the two solar arrays will be coordinated because the BRELLA environmental reviews for the Landfill Site and Blood Farm are being managed separately by the VTDEC Waste Management and Prevention Division and the Blood Farm Site requires an archeological survey prior to construction. See Prefiled Testimony of Martha Staskus at 4-5 in Case No. 21-0651-NMP.



Martha Staskus