



Vermonters for a Clean Environment

Dear Public Utility Commission,

November 8, 2021

Vermonters for a Clean Environment is observing well-intentioned Vermonters submitting public comment in this case. They are expressing concern about the PUC's denial of the CPG based on aesthetics, arguing the same thing the solar developer has been saying, that we have to deploy a lot more solar and so it is wrong to deny a project based on aesthetics. Some commenters are using the term "NIMBY" as a perjorative.

VCE appreciates that the hearing officer and the full Commission evaluated the proposal in the same way that all other solar proposals are reviewed, and took the time to conduct two site visits to fully understand the issues presented by the field on Richville Road.

It is evident that the commenters have not done their due diligence in adequately assessing the site and the issues presented by this specific proposal. The commenters seem to think that all solar everywhere is necessary to achieve the state's goals. That is not true.

As we have observed in the ongoing net-metering rule update, these 500 kW solar arrays are especially challenging. They cannot move forward without a being on a Preferred Site or having obtained a Preferred Site letter. In issuing the Preferred Site letter, the town of Manchester failed to adequately evaluate this site as a possible solar site when they ignored the frequent flooding, including in winter when large blocks of ice would encounter the surrounding fence and screening trees. As noted in the decision denying the project, had the PUC not denied the project on aesthetics, more information about the flooding would be requested from the applicant and the Agency of Natural Resources.

The Richville Road solar project does not have any customers. It would add to the numerous 500 kW net-metered arrays that the PUC has approved that feed power into the grid at a high price that shifts costs to non-net-metering customers. The utility participants in the net-metering rule update are virtually unanimous in asking the PUC to end this practice because it is unsustainable and is unfair to low income ratepayers.

The use of the term "NIMBY" is derogatory and has no place in Vermont's energy discussions. The people who live in areas where developments are proposed have the greatest expertise about the issues in their neighborhood. They are to be valued, not denigrated. Neighbors of the Richville Road solar site run businesses, are fire fighters, and are the people who service the Manchester community.

VCE recognizes that the PUC's decision to deny the project on aesthetics was well reasoned based on the specifics of this particular site. The developer's campaign to get people to weigh in with the same repetitive message mirrors what we have observed whenever solar developers believe their revenues are threatened. This developer would do well to educate his friends who are submitting comments about what makes a good site, with net-metering serving local load, with customers contracted to take the power, that is not out of character with the area and can be adequately screened. The proposed site covered with solar panels would be shocking and offensive to the average person.

Fields that flood in all seasons including winter are not appropriate electric generating solar sites. The field on Richville Road is undeveloped for good reason.

Annette Smith  
Executive Director



**Vermonters for a Clean Environment**