Halladay Solar LLC
170 Bonnet Street
Manchester Center, VT 05255

December 17, 2021

Via First-Class Mail and Email

Town of Middlebury Selectboard
77 Main Street
Middlebury, Vermont 05753

Addison County
Regional Planning Commission
14 Seminary Street
Middlebury, VT 05753

Town of Middlebury
Planning Commission
77 Main Street
Middlebury, Vermont 05753

RE: Halladay Solar LLC's Proposed Standard Offer Solar Project in Middlebury, VT 45-Day Notice of Petition to be filed with Vermont Public Utility Commission

Dear Selectboard Members and Commissioners,

Pursuant to 30 V.S.A. § 248 and Public Utility Commission Rule 5.402, Halladay Solar LLC ("Halladay Solar") is pleased to submit the following pre-petition notice concerning its proposed 2.2 megawatt (MW) "Standard Offer" solar project ("the Project"), to be sited on a parcel of land located off Middle Road South in Middlebury, Vermont. Halladay Solar is owned by MHG Solar LLC, which has developed a number of solar projects in southwestern Vermont.

I. Introduction

Halladay Solar is preparing to file a section 248 petition for a Certificate of Public Good ("CPG") with the Vermont Public Utility Commission ("Commission" or "PUC"), requesting approval to install and operate a 2.2 MW solar electric generation facility to be located off Middle Road in Middlebury, Vermont. The Project would be located on land that is currently owned by Peter Quesnel and Mary Ann Highter. The electricity from the Project will be sold to Vermont electric distribution utilities under the state's Standard Offer Program.

The remainder of this letter describes: (1) Halladay Solar's plans for construction and operation of the Project, including how equipment and materials will be transported to the site; (2) the expected benefits of the Project; (3) a preliminary assessment of potential impacts; (4) the expected date an application will be filed with the PUC; and (5) the rights of persons and entities receiving this notice to comment on the project plans in accordance with PUC Rule 5.402(A).

II. Project Description and Construction Plans

Halladay Solar has an option to purchase a 111 acre (±) parcel of land located off Middle Road South in Middlebury, Vermont from Peter Quesnel and Mary Ann Highter. The Project site will be accessed via a new 16-foot-wide (±) access road off Middle Road South, which bisects the Project parcel.

The 2.2 MW (alternating current, of "AC") solar electric generation facility will occupy up to 15 acres (±) of land. *See* Site Location Map and Site Plan (with Landscape Mitigation), *Attachment A*.

The Project will consist of solar modules mounted on single axis trackers, string inverters, electrical collector system components consisting of underground conduit, wire, AC combiner panel, and AC disconnects. The interconnection equipment will include a pad-mounted three-phase transformer to connect to the existing GMP distribution line on Middle Road South.

A preliminary Site Plan is included in *Attachment A,* which illustrates the anticipated location of the Project's components in relation to the surrounding area. Halladay Solar chose this site based upon its solar exposure, accessibility to existing roads and distribution lines, and its minimal impacts on natural resources and the character of the area. While the attached site plan represents the current preferred layout, the layout that will be contained in the petition to be submitted to the PUC may vary somewhat based upon further engineering, environmental, or other siting considerations. The final layout will be within the overall site area where environmental and other impacts have been evaluated for the purposes of this 45-day notice.

The basic parameters of the site plan include the following working assumptions:

- Access to the solar site will make use of the existing roads within the area, including Middle Road and a new 16-ft-wide (±) access road.

- Construction will be performed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control (2020).

- Year-round daily access to the array is not required. Therefore, no on-site septic or water supply systems will be constructed. The solar project's energy production will be monitored remotely and, if any abnormal conditions are detected, technicians will be dispatched as required.

- The solar project will be enclosed by a perimeter fence and restricted access gate that will meet applicable state and electric safety code standards.

Site Access & Equipment Delivery

Standardized trucking methods will be used to transport the panels and other project components (e.g., racking, wire, conduit, and construction materials) to the site. Typical tractor-trailer and box truck vehicles will be used to transport materials to the site for construction. The Project will not require any oversized loads. The proposed access road coming off Middle Road South will be used for bringing in all construction-related equipment and machinery. Construction equipment will likely include a light duty crane or similar equipment to lift the transformer into place, trucks to move racking around the site, and a small pile driver to install fence posts and racking. A small trencher will be used to install any underground electrical wiring.

Solar Panels and Electrical Collection System

The Project will utilize 6,120 (±) Canadian Solar 580-watt solar panels, or the equivalent, mounted on single axis trackers that layout north-south in rows and rotate the panels east to west throughout the day. The bottom of the solar panels will be at approximately three feet above grade and the top at no more than 13 feet above grade.

The panels will be arranged in rows running north-south and set out in arrays designed to minimize impacts to natural resources. The rows will be connected via underground and above ground electrical cable to string inverters, which convert the electricity from DC to AC. From the inverters, the electrical interconnect line will run underground to a three-phase transformer. The existing distribution line on the parcel will be upgraded to 3 phase for the electrical interconnection, and new utility poles will be installed as necessary to support project infrastructure necessary to safely connect to the grid. All system design and installation methods will be NEC compliant.

The final selection of all equipment will be made after a CPG is issued and contractors and vendors are selected.

III. Project Benefits

The Project is proceeding under Vermont's Standard Offer renewable energy program. The Standard Offer Program was enacted by the Vermont Legislature with the goal of promoting the development of in-state renewable energy sources. Standard Offer helps to ensure that the benefits of these new energy sources flow to the Vermont economy in general, and to the rate-paying citizens of the state in particular. The law provides the ratepaying public with affordable, stable energy prices by allowing renewable energy projects, such as the Halladay Solar Project, to bid on "standard offer" contracts, which are awarded to the projects offering the lowest prices for power. Under the

Standard Offer law, the power is sold to all of Vermont's electric distribution utilities (i.e., not just the interconnecting utility). The benefits that the Project will provide include, but may not be limited to:

- Payment of State educational and municipal property taxes.
- Purchasing project equipment from Vermont businesses, when commercially feasible.
- Employing Vermont businesses for pre-application, construction, and operation and maintenance work, when commercially feasible.
- By revegetating land that is currently plowed on an annual basis for agricultural production stormwater runoff will be reduced resulting in water quality improvements downstream and in Lake Champlain.

In addition to these economic benefits, the proposed solar electric facility will also result in important environmental benefits. The 2016 Vermont Comprehensive Energy Plan set a goal for the State to receive 90% of its energy from renewable resources by the year 2050, and solar power is needed to meet that goal. The solar energy produced by this Project will result in less electricity needed in the New England region from plants that likely use fossil fuel or nuclear energy. It will emit no air pollutants (including CO2) in generating electricity, and thus will help in a small but measurable way to address the State's climate change goals.

IV. Preliminary Impact Assessment

Based upon the initial review performed by Halladay Solar and its consultants (including use of the State's environmental databases), and the Project's proposed siting, the Project will avoid and/or not cause undue adverse impacts to environmental resources and will not create public safety concerns. Key elements include the following:

- The Project has been sited to avoid wetlands and streams and other sensitive environmental resources.
- No rare/endangered plants, significant natural communities, or critical wildlife habitat have been identified within the Project footprint and the required buffers.
- The Project will be designed to meet electric safety and utility interconnection standards for safe and reliable operation of solar electric facilities.

- The Project will require no new municipal services and will not pose undue burdens on town fire, police, or water/sewer services. The Project will not impact the ability of the town to provide educational services.

- As the preliminary aesthetic review provided as *Attachment B* indicates, visibility of the Project will be greatly limited from most offsite locations due to the hilly topography surrounding the solar site and existing vegetation in the area. There would be some limited visibility of the Project from small portions of US Route 7, from the private road north of the Project, and from a private driveway. Halladay Solar's aesthetic consultant has proposed the use of supplemental landscape plantings along the private road north of the Project, in order to avoid any potential undue adverse visual impacts. The Project's Site Plan, *Attachment A*, includes the proposed location of the Landscape Mitigation. Final locations of plantings and species selection will be further defined in the Final Aesthetics Mitigation Plan to be included with the Section 248 Petition.

V. Assessment of On-site Alternatives

The Standard Offer Program requires a renewable energy project to identify a specific location at the time it applies to participate in the program. Halladay Solar identified this site and was selected through a bid system administered by the PUC. Thus, there is no alternative site that Halladay Solar is entitled to develop under the Standard Offer Contract. Once the site was selected, Halladay Solar and its consultants reviewed various configurations within the parcels in order to avoid and/or minimize environmental, aesthetic, or other impacts while maximizing energy output. The result of that process is a proposed configuration that locates the solar array so as to avoid sensitive environmental resources and to minimize the visual impact of the project.

VI. Expected Petition Filing Date with Vermont Public Utility Commission

Halladay Solar intends to file a Section 248 Petition and supporting materials with the PUC soon after the 45-day notice period expires, approximately early February 2022.

VII. Municipal and Regional Planning Commissions' Comments to the Vermont Public Utility Commission

Under 30 V.S.A. § 248(f), the Town and Regional Planning Commissions "shall make recommendations, if any, to the Public Utility Commission and to the petitioner at least 7 days prior to filing of the petition with the Public Utility Commission." PUC Rule 5.402(A). In addition, the Planning Commissions are entitled to provide revised recommendations "within 45 days of the date

on which petitioner has filed a petition with the Commission if the petition contains new or more detailed information that was not previously included in the petitioner's filing with the municipal and regional planning commissions pursuant to Section 248(f)." PUC Rule 5.402(A)(2).

For additional information regarding this process, including your Planning Commission's right to participate in PUC proceedings, please refer to the PUC's website at https://puc.vermont.gov/public-participation.

We here at Halladay Solar hope that you will support this Project, given the benefits it will provide to the town and the State, and given its extremely limited impacts. In the meantime, I invite you to contact me with any questions or comments you have, as we welcome your input and suggestions to make this a successful project.

Sincerely,

Thomas Hand
Halladay Solar LLC

Enclosures:
Attachment A – Location Map, and Site Plan (with Landscape Mitigation)
Attachment B – Preliminary Aesthetic Analysis

CC: Vermont Public Utility Commission (via ePUC)
Department of Public Service (via email)
Agency of Natural Resources (via email)
Division for Historic Preservation (via email)
Agency of Agriculture, Food & Markets (via email)