

**Midway Ave Solar LLC
170 Bonnet Street
Manchester Center, VT 05255**

June 23, 2022

Via First-Class Mail and Email

Town of Berlin Selectboard
108 Shed Road
Berlin, VT 05602

Central Vermont Regional Planning
Commission
29 Main Street, Suite 4
Montpelier, Vermont 05602

Town of Berlin Planning Commission
108 Shed Road
Berlin, VT 05602

**RE: Midway Ave Solar LLC's Proposed 2.2 MW Standard Offer Solar Project in Berlin,
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, Midway Ave Solar LLC ("MAS") 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 Midway Ave in Berlin, Vermont. MAS is owned by MHG Solar LLC, which has developed a number of projects in southwestern Vermont.

I. Introduction

MAS is preparing to file an application for a Certificate of Public Good ("CPG") with the Vermont Public Utility Commission ("PUC"), requesting approval to install and operate a 2.2 MW solar electric generation facility in Berlin, Vermont (the "Project"). The electricity from the Project will be sold to the standard offer program.

The remainder of this letter briefly describes: (1) MAS' 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) the preliminary assessment of potential impacts; (4) the expected date a petition will be filed with the PUC; and (5) the rights of entities receiving this notice to comment on the Project in accordance with PUC Rule 5.402(A)

II. Project Description and Construction Plans

The 2.2 MW (alternating current, or "AC") solar electric generation facility will occupy 14.4 (±) acres on a parcel of land which totals 93.7 acres (±), located off Midway Ave in Berlin, Vermont. *See* Location Map/Site Plan and Preliminary Aesthetics Analysis – *Attachments A and B*.

The Project will consist of solar modules mounted on metal racks, string inverters, electrical collector system components consisting of above ground and below ground conduit and wire, AC combiner panel, and AC disconnects. The interconnection equipment will include a pad-mounted three-phase transformer to step up the voltage to interconnect with the existing GMP distribution line that runs along the southern side of the Project site.

A preliminary Site Plan is included in *Attachment A*. It illustrates the anticipated location of the Project's components in relation to the surrounding area. MAS chose the proposed location for this solar array based upon its solar exposure, accessibility to existing roads and distribution lines, its limited visibility, and 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 final application 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 Vine Street and Route 302 and an existing farm road on the Project parcel that will have a new 12' wide extension running 740 (\pm) in length within the proposed solar array, terminating at the proposed equipment area and turn around.
- Construction will be performed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control (February 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 array for the Project will be enclosed by a perimeter fence that will meet applicable electric safety code standards.

Site Access & Equipment Delivery

Standardized trucking methods will be used to transport the panels and other project components 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 existing access road coming off of Vine Street will be top-dressed as needed, and 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 in place, trucks to move racking around the site, and a small trencher to install underground electrical wiring.

Solar Panels and Electrical Collection System

The Project will utilize 5,460 (\pm), 650-watt solar panels, or the equivalent, mounted on single axis trackers oriented due south. The bottom of the solar panels will be at approximately three feet above existing grade and the top at approximately 12 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 a combination of underground and above ground electrical cable to string inverters, which convert the electricity from DC to AC. From the inverters, the electrical line will run underground to a three-phase transformer. GMP's existing distribution line on the southern side of the Project site will be tapped for the

interconnection, and a few new utility poles will be installed as 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 this 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 (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.

In addition to these economic benefits, the proposed solar electric facility will also result in important environmental benefits. The 2020 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 MAS and its consultants, including review of the State's environmental databases, the siting of the Project will either entirely avoid, or not cause undue adverse impacts to, environmental resources. Nor will it create public health or safety concerns. Key elements of our assessment include the following:

- The Project will utilize an empty field, and has been sited to avoid and/or minimize impacts to wetlands, streams, and other sensitive resources.
- No rare/endangered plants, significant natural communities, or critical wildlife habitat are known to exist within the Project footprint.
- 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.
- A preliminary aesthetic review was performed by MAS's consultant, T.J. Boyle Associates. *See Attachment B.* As their assessment indicates, the Project site is in a relatively obscured location that is separated from development to the southeast by a vegetated hillside, and from other surrounding areas by vegetation and/or landform. See the site plan and photographs in *Attachment B.* Due to the low profile of proposed Project elements, and because the Project location is highly screened from Route 302 and other nearby areas, the Project is not expected to cause undue adverse impacts to the aesthetic and scenic and natural beauty of the area, and supplemental landscape mitigation is not necessary. T.J. Boyle Associates will complete a full aesthetic impact review for inclusion with the petition for a Certificate of Public Good.

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. MAS identified its site and was selected as a Program participant through a bid system administered by the PUC. Thus, there is no alternative site that MAS is entitled to develop under the Standard Offer Contract. Once the site was selected, MAS 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.

VI. Expected Petition Filing Date with Vermont Public Utility Commission

MAS intends to file a Section 248 petition with the PUC after the 45-day notice period expires, likely in August 2022.

VII. Comments of the Municipal Bodies to the Public Utility Commission

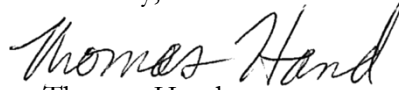
Under 30 V.S.A. § 248(f), the Town and Regional Planning Commissions “shall make recommendations, if any, to the Public Utility Commission and to the petitioner at least 7 days prior to filing of the petition with the Public Utility Commission.” PUC Rule 5.402(A). In addition, the Planning Commissions 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 Midway Ave 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 at the contact information below, as we welcome your input and suggestions to make this a successful project.

Sincerely,



Thomas Hand
Midway Ave Solar LLC
thomas@MHGsolar.com
802-688-3776

Enclosures:

Attachment A – Location Map and Site Plan
Attachment B – Preliminary Aesthetics Analysis

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