

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Randolph Davis Solar LLC for a	)	
certificate of public good pursuant to 30 V.S.A.	)	
§§ 248 and 8010, authorizing installation and	)	
operation of a 500 kW (AC) photovoltaic group	)	Case No. 21-2939-NMP
net-metering system in Randolph, Vermont	)	

**REBUTTAL TESTIMONY OF
MARTHA STASKUS
ON BEHALF OF PETITIONER**

June 24, 2022

Ms. Staskus' rebuttal testimony introduces a revised Project Site Plan, Exhibit RDS MS-2 (rev. 6/17/22) in response to Mr. Binder's and Ms. Allen's direct testimony regarding the Project's potential impacts on wetlands.

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EXHIBITS

Exhibit RDS MS-2 (rev. 6-17-22) **Revised Site Plan**

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**REBUTTAL PREFILED TESTIMONY OF
MARTHA STASKUS
ON BEHALF OF PETITIONER**

1. Introduction

Q1. Please state your name, occupation, and business address.

A1. My name is Martha Staskus. I am Chief Development Officer of Norwich Technologies, Inc. (“Norwich Solar”), which has offices at 15 Railroad Row, Suite 101, White River Junction, Vermont 05001. I have previously submitted testimony and exhibits on behalf of Randolph Davis Solar LLC (the “Petitioner”) in this proceeding.

Q2. What is the purpose of your rebuttal prefiled testimony?

A2. My rebuttal testimony introduces a revised Project Site Plan, Exhibit RDS MS-2 (rev. 6-17-22) in response to Mr. Binder’s and Ms. Allen’s direct testimony regarding the project’s potential impacts on wetlands.

2. Rebuttal Testimony

Q3. Please describe the Site Plan revisions.

A3. In response to conversations during the Project site visit, the Petitioner decided to have its environmental expert, Arrowwood Environmental, assess and delineate the wetland vernal

1 pool on the Binder/Allen parcel. The revised Site Plan maps the delineated Binder/Allen
2 wetland vernal pool, with its accompanying 100' buffer, reducing the Limit of Disturbance
3 (LOD) in the Project area by about 10,200 sf (0.24 acres), and also extends the mapping
4 for the previously delineated wetland adjacent to Davis Road, west of the Project, reducing
5 the LOD in that Project area by about 2,550 sf (0.06 acres). The total reduced LOD is 0.30
6 acre. Ms. Barton's rebuttal testimony addresses the wetlands more specifically.

7
8 **3. Conclusion**

9 Q4. Does this conclude your testimony?

10 A4. Yes.

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