

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of Lowery Road Solar LLC for a )  
Certificate of Public Good, pursuant to 30 )  
V.S.A. § 248, authorizing the installation and )  
operation of a 4.999 MW solar electric ) Case No. 23-\_\_\_\_-PET  
generation facility off Lowery Road in Barre )  
and Orange, Vermont to be known as the )  
“Lowery Road Solar Project” )

**PETITION OF LOWERY ROAD SOLAR LLC  
FOR A CERTIFICATE OF PUBLIC GOOD**

NOW COMES Lowery Road Solar LLC (“Lowery Road Solar” or “Petitioner”), and files this Petition, pursuant to 30 V.S.A. § 248 and Public Utility Commission (“PUC”) Rule 5.400, requesting the PUC to issue a Certificate of Public Good for the so-called Lowery Road Solar Project (“Project”).

1. Lowery Road Solar is a Vermont limited liability company with principal offices at 170 Bonnet Street, Manchester Center, VT 05255.
2. The Project is a 4.999 megawatt (MW) (AC) solar electric generation facility to be sited on 32(±) acres across two parcels of land totaling 291(±) acres, located off Lowery Road in Barre and Orange, Vermont.
3. The Project, as a renewable energy resource, will contribute to the State meeting its energy and sustainability goals for producing electrical energy from renewable resources. It will provide the State with a long-term energy source at stable prices, serving its electrical needs by supplying approximately 8,500,000 kWh of solar power annually, the equivalent of powering approximately 1,300 homes.
4. The Project will also benefit the broader Vermont economy in other ways: by the payment of municipal and education taxes, by employing Vermont businesses for the development work, by purchasing Project equipment from Vermont companies where commercially feasible, and by employing Vermont businesses for construction, installation, and maintenance work.

5. The Project's equipment consists of the following: solar panels mounted on fixed steel racking and steel support structures; inverters, transformers, and associated equipment pads and/or racks; and above- and below-ground electrical lines from the solar array to the Green Mountain Power ("GMP") distribution system. The transformer will use a non-toxic biodegradable cooling oil and will be placed on a secondary containment system. The solar array and inverter/transformer pads will be enclosed within a fixed knot, game-style fence that will be a minimum of 7' high which meets the National Electric Safety Code.
6. The Project will use one of two potential routes for the electrical interconnection line from the on-site Project transformer to the point of interconnection with GMP's existing three phase line located on Lowery Road. Both routes have been analyzed for potential impacts.
7. The site will be accessed via an existing access road, off Lowery Road in Barre and Orange, Vermont.
8. In support of this Petition, Lowery Road Solar submits prefiled testimony and exhibits that address each of the Section 248(b) criteria.

**Request for Relief**

WHEREFORE, Lowery Road Solar respectfully requests the PUC to:

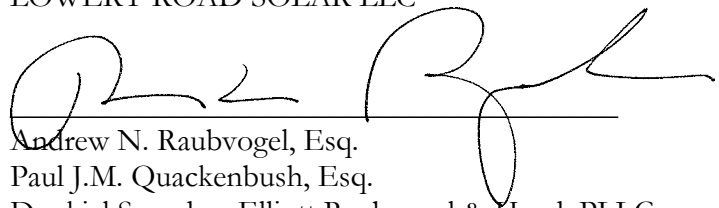
- A. Hold a prehearing conference on the Petition within a reasonable period of time;
- B. Conduct such other proceedings as the Commission determines necessary;
- C. Render an affirmative decision on this Petition;
- D. Make findings as required by 30 V.S.A. § 248 that Lowery Road Solar shall be authorized to construct and operate up to a 4.999 MW solar electric generation facility in Barre and Orange, Vermont, and that the Project will promote the general good of the State of Vermont, and authorize Lowery Road Solar to undertake the actions described herein and in the attached testimony and exhibits and issue a Certificate of Public Good to that effect; and

E. Take such other action as may be required for the expeditious review and approval of this  
Petition.

Dated at Burlington, Vermont this 13<sup>th</sup> day of June, 2023.

LOWERY ROAD SOLAR LLC

By:



Andrew N. Raubvogel, Esq.  
Paul J.M. Quackenbush, Esq.  
Dunkiel Saunders Elliott Raubvogel & Hand, PLLC  
91 College Street, P.O. Box 545  
Burlington, Vermont 05402-0545  
[araubvogel@dunkielsaunders.com](mailto:araubvogel@dunkielsaunders.com)  
[pquackenbush@dunkielsaunders.com](mailto:pquackenbush@dunkielsaunders.com)  
(802) 495-5413  
(802) 495-5259