Post Road Solar LLC
170 Bonnet Street
Manchester Center, VT 05255

June 21, 2023

Via First-Class Mail and Email

Town of Rutland Selectboard
181 Business Route 4
Rutland, VT 05736

Rutland Regional Planning Commission
The Opera House
67 Merchants Row
Rutland, VT 05701

Town of Rutland Planning Commission
181 Business Route 4
Rutland, VT 05736

RE: Post Road Solar LLC's Proposed 3 MW Solar Project in Rutland, 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, Post Road Solar LLC ("Post Road Solar") is pleased to submit the following pre-petition notice concerning its proposed 3 megawatt (MW) solar project ("the Project"), to be sited on a parcel of land located off Route 7 in Rutland, Vermont. Post Road Solar is owned by MHG Solar LLC, which has developed a number of projects in southwestern Vermont.

I. Introduction

Post Road Solar 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 3 MW solar electric generation facility in Rutland, Vermont (the "Project"). The electricity from the Project will be sold to Green Mountain Power.

The remainder of this letter briefly describes: (1) Post Road 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) 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 3 MW (alternating current, or "AC") solar electric generation facility will occupy 10.8 (±) acres on a parcel of land which totals 23.5 acres (±), located off Route 7 in Rutland, Vermont. *See* Location Map/Site Plan – *Attachment A*.

The Project will consist of solar modules mounted on metal racks, 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 step up the voltage, after which the power will run along a new underground line through the Project parcel to interconnect with the existing GMP distribution line located along Route 7.

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. Post Road Solar 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 Route 7. A new gravel road will be installed to access the transformer location and an existing field road through the property will be improved with a gravel base to reach the eastern array.

- 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. A new access road coming off Post Road 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 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 9,750 (±), 400-watt solar panels, or the equivalent, mounted on fixed tilt racking 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 east-west 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 parcel will be tapped for the interconnection, and a few new utility poles will be installed as necessary to safely connect to the grid.

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

III. Project Benefits

The Post Road Solar Project will provide economic benefits including: (i) payment of State educational and municipal property taxes; (ii) purchasing project equipment from Vermont businesses, when commercially feasible; and (iii) 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 2022 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 CO_2) in generating electricity, and thus will help in a small but measurable way to reduce global warming, acid rain, and the negative public health effects associated with the use of fossil fuel and the waste storage challenges presented by nuclear energy production.

IV. Preliminary Impact Assessment

Based upon the initial review performed by Post Road Solar 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 principally utilize former agricultural land and has been sited to minimize impacts to wetlands and streams.

- 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.

- Post Road Solar's aesthetic consultant, T.J. Boyle Associates, LLC ("TJB"), a landscape architecture and planning firm, has reviewed the initial design plans and performed a preliminary visual analysis of the areas of the proposed Project. The Project will result in a limited increase in visibility of solar generation infrastructure from surrounding public vantage points, in particular from U.S. Route 7 immediately west of the Project where a gap exists in the roadside vegetation that otherwise helps screen the Project. Other solar generation structures currently exist in the area, including an existing array approximately 1,300' north of the Project and another array approximately 1,400' south, both of which are currently visible from Route 7. To help screen the Project from Route 7, a preliminary landscape mitigation plan has been prepared that augments the existing roadside vegetation immediately west of the Project (see *Attachment A*). Post Road Solar's Petition will include a full analysis of potential aesthetic impacts and proposed landscaping mitigation measures. TJB's preliminary analysis indicates that the proposed Project will not result in an undue adverse impact on aesthetics or the scenic or natural beauty of the area.

V. Assessment of On-site Alternatives

Post Road Solar and its consultants reviewed various configurations within the Project parcel that it has rights to, 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 utilizes a low impact mounting system and locates the solar array so as to avoid sensitive environmental resources.

VI. Expected Petition Filing Date with Vermont Public Utility Commission

Post Road Solar intends to file a Section 248 petition with the PUC after the 45-day notice period expires, which would be no sooner than August 2023.

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 Post Road 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
Post Road Solar LLC
thomas@MHGsolar.com
802-688-3776

Enclosure:

Attachment A – Location Map and Site Plan with Landscape Mitigation

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)