STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24-____-PET

Petition of Essex A North Lot Solar, LLC for a certificate of public good pursuant to 30 V.S.A. § 248 for a 3.5 MW ground-mounted solar array located off Robinson Parkway in Essex Junction, Vermont.

PREFILED TESTIMONY AND DECLARATION OF STEPHANIE WYMAN ON BEHALF OF ESSEX A NORTH LOT SOLAR, LLC

This has been filed EPUC

Summary of Testimony

Ms. Wyman's testimony addresses the Project's compliance with Section 248(b)(5) with respect to Waste Disposal, Soil Erosion, and Primary Agricultural Soils.

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

A1. My name is Stephanie Wyman. I am a civil engineer at Vanasse Hangen Brustlin, Inc. (VHB), State of Vermont Professional Engineer #134215. My business address is 40 IDX Drive, Building 100, Suite 200, South Burlington, Vermont.

Q2. What is the purpose of your testimony?

A2. My testimony supports the application of Essex A North Lot Solar for Section 248 approval of a 3.5 MW solar electric generation facility (Project) to be located between Maple Street (Vermont Route 117) and Robinson Parkway in Essex Junction, Vermont.

Specifically, my testimony provides an overview of the Project, describes my work developing the site plan, and addresses the Project's compliance with Section 248(b)(5) with respect to Waste Disposal, Soil Erosion, and Primary Agricultural Soils.

Q3. Please describe your professional background, qualifications, and experience.

A3. I hold a B.S. degree in Environmental Engineering (2011) from the University of Vermont. My education and professional experience include transportation engineering, civil/environmental engineering, and commercial and residential project design. I have over 10 years of experience planning, permitting, and monitoring erosion prevention and sediment control (EPSC), and designing, permitting, and inspecting stormwater management systems. A more detailed description of my experience is provided in Exhibit EANL-SW-1.

Q4. Have you previously testified before the Public Utility Commission (Commission)?

A4. Yes. I have provided prefiled testimony to the Commission previously. Most recently, I testified in Case No. 23-1447-PET on behalf of VT Real Estate Holdings 1 LLC (Shaftsbury Solar) which is currently under review. Additionally, I have provided technical design support and expertise on over twenty projects that were reviewed and approved or are under review by the PUC, including but not limited to ER Waite Cemetery Solar, LLC (Case No. 21-4073-PET), Olde Farmhouse Road Solar, LLC (Case No. 22-4918-PET), ER Danyow Road Solar, LLC (Case No. 22-3427-PET), and Boardman Hill Solar, LLC (Case No. 22-1644-PET).

Q5. Please describe the work you conducted with respect to the Project.

A5. My involvement with this Project includes the civil/site engineering design. I prepared the site plans for the Project, which is sponsored by overview witness Jake Clark (Exhibit EANL-JC-2) and reviewed the plans with respect to potential impacts under certain Section 248 criteria. In preparing the site plans we have performed the following tasks and evaluations:

1. Design of the site plans, including access drive grading, drainage, erosion prevention and sediment control measures, fencing, and secondary oil containment design;
2. Construction and Operational phase stormwater permitting needs; and
3. Presence and protection of primary agricultural soils.

In addition, the Project will require 5 new poles (1 riser pole, and 4 more poles) and new overhead lines to connect with the existing Green Mountain Power (GMP) owned pole on the east side of the Police Station access road, where the Project will interconnect with

GMP's existing distribution network. All proposed utility poles and overhead electrical lines will be owned and installed by GMP. VHB understands that the Petitioner has agreed to accept responsibility for ensuring adequate steps are taken during the installation of the GMP components to avoid undue adverse impacts to protected natural resources.

SECTION 248 CRITERIA

Waste Disposal – 10 V.S.A. § 6086(a)(1)(B)

Q6. What are the Project's plans for waste disposal?

A6. VHB has reviewed the Petitioner's plan for disposal of wastes under this criterion as it relates to sanitary wastewater, operational stormwater runoff, general construction waste including tree and brush debris, and potential historical site contamination. VHB also reviewed the Project's plans for transformers and transformer coolant, including oil containment and applicability of a Spill Prevention Control and Countermeasure (SPCC) Plan.

The Project as designed will meet applicable regulations or current guidance regarding the disposal of waste and does not involve the injection of waste materials or toxic substances into ground or surface waters. The Project operation will not generate sanitary waste. Because the amount of existing and proposed impervious surfaces encompassing the GlobalFoundries campus totals more than the 1-acre threshold, the Project will be required to treat all new impervious areas. The majority of the GlobalFoundries campus has coverage under a National Pollutant Discharge Elimination System (NPDES) Permit 3-1295, therefore all new impervious surface created by the Project has been designed to discharge to the existing permitted system and will receive

coverage under the existing permit. Details of VHB's assessment under the Waste Disposal § 6086(a)(1)(B) criterion is included in a memorandum attached as Exhibit EANL-SW-2.

As described in Exhibit EANL-SW-2, the Project will generate minor amounts of scrap and waste material during installation, and this waste will be disposed of or recycled at an approved disposal facility in accordance with Vermont Solid Waste Management Rules. The Project is not anticipated to generate any waste during operation. Woody debris generated by any shrub and tree clearing will be either offered to the landowners for use as firewood, or will be chipped, piled, or transported off site.

In addition, given the developed and industrial use of the Project parcel, Petitioner will work with the DEC Sites Management Sections (SMS) to ensure Project soils are sampled, tested, and managed appropriately and in accordance with applicable regulations as needed, thus the Project will meet applicable DEC regulations regarding the disposal of wastes.

As detailed further in Exhibit EANL-SW-2, the Project on its own does not require an SPCC Plan. Regardless the Project transformer will be placed within a secondary containment structure to prevent the release of transformer oil to the environment. The 4.2 MVA pad-mounted transformer will be housed within secondary oil containment, sized to contain 110 percent of the largest anticipated volume of a potential release of transformer dielectric fluid, plus a 5-inch rainwater event. See containment detail, Exhibit EANL-JC-2.

Soil Erosion – 10 V.S.A. § 6086(a)(4)

Q7. Will the Project cause unreasonable soil erosion or a reduction in the capacity of the land to hold water so that a dangerous or unhealthy condition may result?

A7. No. Because the Project will involve more than one acre of earth disturbance, it will require authorization by the Department of Environmental Conservation under an Individual Construction Stormwater Permit (INDC). The permit will require implementation of Best Management Practices (BMPs) to control erosion and discharge of sediment from the construction site through a site-specific Erosion Prevention and Sediment Control Plan as determined by the Project's risk category. Because the amount of existing and proposed impervious surfaces encompassing the GlobalFoundries campus totals more than the 1-acre threshold, the Project will be required to treat all new impervious areas. The Project parcel has coverage under a National Pollutant Discharge Elimination System (NPDES) Permit 3-1295, and the new impervious area will be covered under the existing permit. See Exhibit EANL-SW-2 for more details.

Primary Agricultural Soils – 10 V.S.A. § 6086(a)(9)(B)

Q8. Will the Project result in undue adverse impacts to Primary Agricultural Soils, as defined by 10 V.S.A. § 6001(15)?

A8. No. As explained in more detail in Exhibit EANL-SW-3, the Project will involve direct impacts to mapped Primary Agricultural Soils (PAS) as mapped by the NRCS and per the definition in § 6001(15). However, based on the lack of connectivity to other PAS in the vicinity and the previous impacts and existing infrastructure, it is VHB's opinion that the Project will not result in PAS impacts, or will impact an area of PAS with such little agricultural value that the impacts are de minimis.

Q9. Does that conclude your testimony at this time?

A9. Yes, it does.

EXHIBIT LIST

EANL-SW-1: Resume

EANL-SW-2: Waste Disposal/Soil Erosion Assessment

EANL-SW-3: Primary Agricultural Soils Assessment

WITNESS DECLARATION

I, Stephanie Wyman, being over 18 years of age, and competent to testify on these matters declare that on behalf of Petitioner, I prepared my prefiled testimony and exhibits in the above captioned matter and I have the necessary expertise to testify to the same information. I declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at South Burlington, Vermont, this 18th day of June, 2024.

Wyman, Stephanie Digitally signed by Wyman, Stephanie
DN: CN="Wyman, Stephanie"
Date: 2024.06.18 21:38:52-04'00'

Stephanie Wyman