STATE OF VERMONT
PUBLIC UTILITIES COMMISSION

Case No. _____

Petition of Vermont Renewable Gas, LLC for a Certificate of Public Good Pursuant to 30 V.S.A. § 248(j) for a Farm Methane Facility in Lyndon, Vermont	)))

PREFILED TESTIMONY OF ALEXANDER SKOROKHODOV ON BEHALF OF

VERMONT RENEWABLE GAS, LLC

Summary of Testimony

Mr. Skorokhodov's testimony addresses a General Overview of the proposed Vermont Renewable Gas – Lyndon and the project's compliance the following criteria:

30 V.S.A. § 248(b)(3)	System Stability and Reliability
30 V.S.A. § 248(b)(5)	Natural Resources
10 V.S.A. § 6086(a)(1)(B)	Waste Disposal
10 V.S.A. § 6086(a)(2) and (3)	Water Supply
10 V.S.A. § 6086(a)(5) and 9(K)	Transportation
30 V.S.A. § 248(b)(5)	Public Health and Safety
30 V.S.A. § 248(b)(10)	Existing or Planned Transmission Facilities
30 V.S.A. § 248(b)(11)	Woody Biomass Facilities
PUC Rule 5.900	Decommissioning Plan and Estimate

EXHIBIT LIST

Ex. VRG-AS-0	**Alexander Skorokhodov Resume**
Ex. VRG-AS-1	**NVDA Industrial Park Map**
Ex. VRG-AS-2	**Topographical and Survey Maps**
Ex. VRG-AS-3	**Scaled Engineering, Cross-Section, and Elevation Drawings**
Ex. VRG-AS-4	**LED System Impact Study**
Ex. VRG-AS-5	**Deed Covenants and Restrictions**
Ex. VRG-AS-6	**Site Photos**
Ex. VRG-AS-7	**Building Conceptualization**
Ex. VRG-AS-8	**System Efficiency Certification**
Ex. VRG-AS-9	**Decommissioning Plan and Estimate**

Q1: Please state your name and position relative to this Petition.

A1: My name is Alexander Skorokhodov. I am Director of Technology and Engineering for Clean Energy Technologies, Inc. (CETY), a NASDAQ publicly traded company on the New York Stock Exchange. CETY's wholly owned subsidiary CETY Capital, LLC is a minority owner in Vermont Renewable Gas, LLC ("VRG"), a Vermont limited liability company with its principal place of business at 145 Pine Haven Shores #1000A Shelburne, Vermont 05482. CETY is also serving as project Engineering, Procurement, and Construction (EPC) contractor for the Project.

CETY designs, builds, and markets renewable energy and energy efficient solutions. We offer a suite of zero emission heat recovery solutions, combined heat to power, and biomass energy products. As Director of Technology and Engineering for CETY I lead the CETY Renewables Division. In this capacity I lead engineering and development of the Project and my team will oversee construction and commissioning of the Project. We will also perform long-term service and maintenance of the facility equipment.

Q2: Please describe your qualifications and experience.

A2: I am a graduate of Moscow Aviation University where I earned a degree in automated control systems engineering. I also hold a Masters of Business Administration in International Business from Antwerp University's School of Management. I am an inventor and developer of CETY's High Temperature Ablative Pyrolysis (HTAP) renewable fuel gas technology. Over 18 years, I have developed and implemented more

than 250 onsite power generation projects for major energy and industrial customers. To date I have developed 6 projects in Europe which rely on the HTAP technology to be used at VRG's Lyndon site. Additional information about my career can be found in my attached resume', **Ex. VRG-AS-0 Alexander Skorokhodov Resume.**

Q3: What is the purpose of this Petition?

A3: This Petition seeks approval for the construction and operation of a 2,200 kW AC farm methane facility in Lyndon, Vermont ("the Project").

Q4: What is the purpose of your testimony?

A4: My testimony provides a general overview of the Project, and also addresses the Project's compliance with various Section 248 criteria, including:

30 V.S.A. § 248(b)(3)	System Stability and Reliability
30 V.S.A. § 248(b)(5)	Natural Resources
10 V.S.A. § 6086(a)(1)(B)	Waste Disposal
10 V.S.A. § 6086(a)(2) and (3)	Water Supply
10 V.S.A. § 6086(a)(5) and 9(K)	Transportation
30 V.S.A. § 248(b)(5)	Public Health and Safety
30 V.S.A. § 248(b)(10)	Existing or Planned Transmission Facilities
30 V.S.A. § 248(b)(11)	Woody Biomass Facilities
PUC Rule 5.900	Decommissioning Plan

Q5: What work has CETY performed in connection with this Project?

A5: We have provided design services in the development of the Site Plan for this Petition, with the subcontracting assistance of Truline Land Surveyors, Inc. of Saint Johnsbury, Vermont, MW Soils Engineering, Inc. of Charlestown, New Hampshire, Catamount Engineering Services, Inc. (Catamount) of Burlington, Vermont, and Engineering Services of Vermont, LLC (Engineering Services of Vermont) of Waterbury Center, Vermont. Catamount has offered separate testimony in conjunction with my own testimony to touch on specific Section 248 criteria. Please see Prefiled Testimony of Jeffrey Olesky**.**

We have also analyzed natural resource, environmental, and aesthetic impacts as they relate to the criteria set forth in 30 V.S.A. § 248. CETY has been assisted with the subcontracting assistance of Berkshire Environmental Consultants, Inc. (BEC) of Pittsfield, Massachusetts (see Prefiled Testimony of Maura Hawkins), Horizons Engineering, Inc. of Newport, Vermont (see Prefiled Testimony of Elias Buzzell), and Innovative Natural Resource Solutions, LLC (INRS) of Portland, Maine (see Prefiled Testimony of Eric Kingsley). Our collective efforts included field visits from environmental scientists, land surveyors, geotechnical engineers, and civil engineers. Staff in-house at CETY and within our subcontracting firms aided in the development of supplemental maps used for inventory and analysis.

Because the sound generated by this Project will be negligible, and there are no residences within 800 feet of the Project, we did not conduct a sound study. Two structures are located approximately 800 and 2,000 feet, respectively, southeast of the

Project site through a densely wooded area on property owned by DPP, LLC, at 657 Industrial Parkway in Lyndon. It is unclear if these structures are presently residences. All other residences in the area are further from the Project site. Notably, the Vermont Department of Environmental Conservation (DEC) did not find a sound study to be a necessary component of our Air Pollution Permit.

Q6: What are the applicable environmental permits that CETY anticipates the Project will need?

A6: With the assistance of subcontractor Catamount, we have applied to the Vermont Department of Environmental Conservation (DEC) for a Wastewater and Water Supply Permit, a Stormwater Construction General Permit and an Operational Stormwater Permit. We have also applied for approval to connect to municipal water supply and wastewater systems. All of these permits are addressed in detail in Jeffrey Olesky's prefiled testimony.

We have also applied for, and received, an Air Pollution Permit to Construct and Operate (AOP-23-048), **Ex. VRG-MH-2**, issued by DEC's Air Quality and Climate Division, which is addressed further in Maura Hawkins' prefiled testimony.

Q7: Please describe the property where VRG intends to construct the Project:

A7: The Project will be located within the Saint Johnsbury – Lyndon Industrial Park, on Industrial Parkway in Lyndon, on a +/- 8 acre parcel currently owned by the Northeastern Vermont Development Association. The Project site is identified as Lots C2, C3, and C4

on the NVDA map attached as **Exhibit VRG-AS-1, NVDA Industrial Park Map**. The location of the facility is further shown on **Exhibit VRG-AS-2, Topographical and survey maps; and Exhibit VRG-MH-4, Agency of Natural Resources Atlas Map.** Photographs of the site are submitted as **Ex. VRG-AS-6, Site Photos.** The Project will be built out on approximately 3 acres of the Property, with the remaining approximately 5 acres remaining undisturbed.

VRG has a Purchase and Sale Agreement for the project site with NVDA . Under that agreement, the project site is presently held in escrow pending successful completion of all permits and approvals necessary to construct the facility.

Q8: Please give an overview of the Project.

A8: There are two principal components to this project: an organic waste decomposition (High Temperature Ablative Pyrolysis (HTAP)) system which produces biogas, and an electrical generator room. The HTAP system decomposes organic waste in an oxygen-free environment to produce a renewable fuel gas containing methane. The project site and limits of disturbance are depicted in **Ex. VRG-JO-1 - Civil Design Plan Set**. Project components are further illustrated in **Exhibit VRG-AS-3, Scaled Engineering and Elevation Drawings**.

VRG plans to receive chipped, lignocellulosic fiber that is waste derived from farming operations and a minority of other non-farm clean woody residuals for production of this fuel gas. This gas is used as a fuel for synchronous biogas

engine/generator sets. The electricity produced by these generator sets will be sold pursuant to a Vermont Standard Offer Power Purchase Agreement.

Q9: Please describe the components of the Project and how the Project operates to produce electricity.

A9: Feedstock will arrive by tractor trailer truck or short truck from local producers. All trucks will enter and exit the Facility via Industrial Parkway from existing industrial park access points on U.S. Route 5. Project operations employees and equipment servicing personnel will also enter and exit through these access points. Please see **Exhibit VRG-AS-1, NVDA Industrial Park Map; Exhibit VRG-AS-3, Scaled Engineering and Elevation Drawings; Ex. VRG-JO-1 - Civil Design Plan Set**.

If trucks have self-unloading capability, they can unload directly into a feedstock receiving bin. This is a covered area bordering the southern face of the facility building that houses the major plant equipment. This covered area includes a feedstock hopper that directly feeds the plant. If trucks are unable to unload themselves, then we will employ the use of a truck dumper which is a piece of equipment that safely tips a trailer into the covered feedstock unloading area. Chipped feedstock will enter the building via live bottom floor technology for pre-treatment prior to decomposition.

Pre-treatment will ensure organic matter decomposes within a short period of time. Pre-treatment will occur in the building. Feedstock will first pass through a twin-shaft shredder to pre-size it to pieces of 30 millimeters or less. A combination hammer mill/dryer unit will be employed. The hammer mill will grind down the feedstock to a

reduced size of 2.5 millimeters or less. Low temperature waste heat from the biogas generator sets (operating in combined heat- and power-generating (CHP) mode) and some residual waste heat from the HTAP system will be used to heat ambient air. This ambient air will pass through the ground feedstock within the confines of the dryer section of the combination hammer mill/dryer unit. Feedstock will be dried consistently to 5% moisture content, which is optimal for decomposition.

The ground, dried feedstock is then stored in two buffer silos outside the building's eastern wall. The feedstock is automatically metered and augured back into the building for decomposition in the HTAP system. The Project incorporates dual organics-to-energy reactor vessels. In the first vessel, the self-contained high temperature occurring in the reactor vessel extracts volatiles from the organic matter in an anaerobic environment. Moving into the second vessel, thermos-catalytic cracking of the volatiles occurs, creating a tar-free, high-heating-value fuel gas. Both the extraction and cracking stages take place within a self-contained, high-temperature anaerobic environment. The process in each vessel takes about 5 seconds. There are no air emissions associated with either process.

The remaining waste from the process, a carbon-rich biochar, will be extracted and conveyed for temporary storage into a holding silo, adjacent the feedstock buffer silos outside the eastern wall of the building. All biochar produced by the Project will be removed from the property. Plant staff will periodically deposit biochar from the silo into bulk receptacles within the biochar canopy area of the plant. Farmers and other end users will then directly load trucks from this biochar canopy area to remove biochar from the

facility. Biochar is used as a soil amendment and carbon storage commodity. Biochar can also be used to produce green activated carbon and other industrial products. Concepts for use in low-carbon building materials are also being developed through global research.

The fuel gas is conditioned for use in three synchronous biogas engines. Conditioning means removal of mechanical particles and droplets, cooling of the gas, and pressurizing to renewable fuel gas specification requirements for biogas engine/generator units. A mechanical separator is used for coarse particles and a ceramic candles filter is used for fine particles removal. For increasing the pressure of the gas, VRG will use a standard centrifugal compressor. These conditioning techniques are standard practice in farm methane and landfill gas applications.

The gas is then received in a gas receiver and distributed to the biogas engines with a plant capacity of 2,200 Kwh/hr at 96% capacity, or approximately 18,500 MWh annually.

In the event of a shutdown of the engines due to emergency, VRG will employ the use of an emergency flare. This emergency flare, similar to the type used at other farm methane projects and landfill gas projects, will sit to the southeast of the plant building. The emergency flare will also be used during startup of the facility, during initial commissioning, and for planned maintenance events on a limited basis.

At the gas-to-power generation stage, the gas is fed into the cylinders within the biogas engines. Spark plugs will ignite the gas. Combustion releases the energy in the gas which is converted into heat and mechanical force to drive the engines' crank shafts. The

crank shafts in turn rotate alternators to produce electricity. The electricity will be exported directly through an interconnection point with the Town of Lyndon Electric Department's (LED) electric distribution system at the project site. All electric power produced will be sold through a Vermont Standard Offer Power Purchase Agreement.

The engines chosen for this project are Guascor biogas engines. These engines are specifically manufactured to operate on renewable gaseous fuels. The engines will be operated in combined heat and power (CHP) mode. As aforementioned, waste heat will be recovered for pre-treatment of the incoming organic material. Waste heat will also be recovered to operate a small islanded Organic Rankine Cycle (ORC) generator which will turn an electric motor to provide electrical power for the pre-treatment area. This ORC generator will not be interconnected to the utility distribution grid, but instead will only be used to provide electricity on site. Use of waste heat for pre-treatment as well as operation of the ORC unit assures that VRG is maximizing the facility's efficiency to the greatest extent possible. Please see **Ex. VRG-AS-8, System Efficiency Certification**.

This process employed in the facility is modular, highly efficient, and simple to install. The emissions associated with the facility are non-major and were found to be such by DEC. in its issuance of AOP-23-048. Selective catalytic reduction (SCR) technology will be incorporated on each engine to bring carbon monoxide and nitric oxide levels within state emissions limitations per the requirements of AOP-23-048. As aforementioned, no emissions will be emitted from production of the fuel gas itself. Any emissions (at low levels) associated with the pre-processing of incoming organic material will be captured through a filtration system.

The Project will incorporate an emergency diesel generator and an emergency oil boiler for limited emergency scenarios or in the case of the boiler to assist in a black start scenario.

Q10: How long will it take to build out the Project?

A10: The construction phase is anticipated to last approximately 9 months. Construction will be limited to the hours between 7:00 A.M. and 7:00 P.M. Monday through Friday and between 8:00 A.M. and 5:00 P.M. on Saturdays with no construction allowed on state or federal holidays or on Sundays.

SECTION 248 CRITERIA

Q11: Will the Project adversely affect System Stability and Reliability, pursuant to 30 V.S.A. § 248(b)(3)?

A11: No. The Town of Lyndon Electric Department (LED) conducted an Interconnection and System Impact Study that concluded interconnection of the Project should not have an adverse impact on safety and reliability of the area electric power system. **Ex. VRG-AS-4, LED System Impact Study**. The Study concludes that "The LED system can accommodate the interconnection of the Proposed Facility, subject to" certain conditions, including specific infrastructure upgrades. None of these required infrastructure upgrades include the construction of new utility electric lines, distribution lines, or rights-of-way. The Project will interconnect into the existing distribution system within the industrial park. LED notes in the Study that from a thermal standpoint, the affected 12.47

kV and 34.5 kV portions of the LED and Green Mountain Power systems and even the 115 kV Vermont Electric Power Company (VELCO) line (the major distribution and transmission components in the vicinity of the Project) are able to accommodate the Project. VRG, with CETY's assistance as Project EPC, will build, operate, and maintain the Project in compliance with the conditions of the System Impact Study. In accordance with Rule 5.500, VRG will enter into an interconnection agreement with LED within 30-days of issuance of a Section 248 Certificate of Public Good for the Project. This interconnection agreement will conform to the requirements of Commission Rule 5.500.

Q12: Will the Project have undue adverse effects on the natural environment, pursuant to 30 V.S.A. § 248(b)(5)?

A12: No, as explained in my detailed answers that follow, and through the testimony of other individuals accompanying this petition, the Project will not have an undue adverse effect on the natural environment as judged by the criteria specified in 10 V.S.A. 1424a(d) and §§ 6086(a)(1)(A)(8), and (8)(A) in whole or in pertinent part.

Q13: Will the Project have an undue adverse effect with respect to the use of natural resources pursuant to 30 V.S.A. § 248(b)(5)?

A13: No, the Project will not have an undue adverse effect on natural resources. The Project will be located in an industrial park, developed by the town of Lyndon, the town of Saint Johnsbury, and the Northeastern Vermont Development Association for the type of development proposed in this Project. To prepare the Project site, tree clearing or cutting

will be kept to a minimum. The Project site is largely already cleared. The Project will require clearing and cutting of a 250-foot section of trees, south to north for purposes of assuring adequate gradation and associated soil retainage. This section of trees will be cut to an average depth of 10 feet to the east, with 20 feet being the deepest section of clearing. Please see the **Prefiled Testimony of Jeffrey Olesky**. The Project will not otherwise use or deplete natural resources at the site. Additionally, the Project will utilize chipped lignocellulosic waste from existing farm production in the Northeast Kingdom region and will turn these byproducts into heat and electricity.

Q14: Please describe the height of project features in relation to existing buildings and/or vegetation as required under PUC Rule 5.403(A)(10) and (13).

A14: CETY has prepared a cross-section of the site showing existing and proposed conditions and the height of project features in relation to existing vegetation. These proposed features include the Project building, silos, feedstock area, and emergency flare in relationship to the height of trees on the property. All relevant dimensions are detailed in these drawing. As can be seen in the drawings, the height of nearby trees at their highest point (approximately 876 feet above sea level) is of similar height to the proposed Project building. **Ex. VRG-AS-3 – Scaled Engineering, Cross-Section, and Elevation Drawings**.

Q15: Please describe any elevation drawings prepared by CETY as they relate to Section 5.403(A)(10) and (13).

A15: The elevation drawings prepared by CETY demonstrate the elevation of the Project building and other associated items including the silos, emergency flare, and feedstock preparation area. This area is approximately 840 – 843 feet above sea level. The elevation drawings are drawn at right angles, showing the ground profile at least 100 feet beyond the edge of the proposed clearing. The heights of surrounding trees are also present. **Ex. VRG-AS-3 Scaled Engineering, Cross-Section, and Elevation Drawings**.

Q16: Please describe your consideration of waste disposal for the Project, pursuant to 10 V.S.A. § 6086(a)(1)(B).

A16: The Project will generate minor amounts of scrap and waste material during construction and installation, and this waste will be disposed of or recycled at an approved disposal facility in accordance with Vermont's *Solid Waste Management Rules*. In addition, we have applied for a state Wastewater and Water Supply Permit and for approval to connect to a municipal sewer system to serve an employee kitchen and bathrooms. Please see the testimony of **Jeffrey Olesky** for further detail.

Q17: Does the Project involve the injection of waste material or any harmful or toxic substances into groundwater or wells?

A17: No, the Project will not inject harmful or toxic substances into groundwater or wells. The HTAP system will produce a solid biochar that will be shipped offsite for sale as a soil amendment or other uses. Consumables replaced during electrical generator maintenance will be accumulated in separate enclosed vessels and disposed of at approved disposal

facilities. Disposables include lubrication oils and glycol. These technical liquids will be disposed at the referenced approved disposal facilities and will not be merged with sanitary wastewater. Consumables also include replaced parts (hardware). We will have a space to store these spare parts inside of the Project building. No onsite treatments are needed for these replaced parts.

Q18: Will the Project meet any applicable Health and Environmental Conservation regulations regarding the disposal of wastes?

A18: Yes, the Project will not require any sanitary waste treatment or use of public waste treatment facilities for industrial wastes. Small volumes of sanitary water, between 0 and 500 gallons per day will be sent to the town of Lyndon public waste treatment facility, in the same manner that other commercial, residential, and industrial businesses in Lyndon currently do.

Q19: Will the Project require a Spill Prevention, Control, and Countermeasure ("SPCC") plan?

A19: No. The Project site will not store more than 1,320 gallons of oil or oil products such as diesel fuel, gasoline, lube oil, hydraulic oil, adjuvant oil, crop oil, vegetable oil, or animal fat.

Q20: Is there sufficient water supply available to meet the needs of the project under 10 V.S.A. § 6086(a)(2) and (3)?

A20: Yes. The facility itself will not use any water to produce biogas or electricity. The only water used in association with the Project will be to supply the employee kitchen and bathrooms. This water will be provided via a municipal water supply system, as explained in the Prefiled Testimony of Jeffrey Olesky.

Q21: Will the Project have an adverse impact on traffic and highways pursuant to 10 V.S.A. § 6086(a)(5) and (9)(K)?

A21: No. Once operating, the Facility will require a small amount of truck traffic, taking in 3 to 5 trucks daily of feedstock for gas production. Between 0 and 1 trucks daily will remove biochar byproduct from the Facility. Trucks will enter and exit the Facility via Industrial Parkway, using existing access to the industrial park on US Route 5. This is not expected to have any impact on traffic in the area, since frequent truck traffic to and from the industrial park is part of the normal course of business for several industrial park businesses.

Employees will also arrive and depart via Industrial Parkway, using the existing access points on US Route 5. Between 10 and 13 employees will arrive daily in passenger vehicles, with 6 to employees arriving at peak hours. Occasional service and maintenance appointments will be scheduled for the plant. These appointments are for routine or emergency maintenance and are not regular vehicle trips associated with the Facility. Such service and maintenance visits would generally involve one commercial truck or van.

The Petitioner consulted with the Vermont Agency of Transportation (VTrans), which performed an initial review of the project traffic flow and determined that VTrans does not have any concerns with the Project from a standpoint of traffic safety. **Ex. VRG-ED-5, VTrans 1.29.24 email**.

Q22: Will the project have an undue adverse effect on public health and safety, pursuant to 30 V.S.A. § 248(b)(5)?

A22: No, the Project will not have any undue adverse effects on the health, safety, and welfare of the public. The Project will be constructed in accordance with the National Electrical Safety Code and the National Electric Code. VRG will also ensure that all facility equipment complies with applicable UL and IEEE standards and other standards, including OSHA. VRG will also ensure that the facility abides by all fire safety and building regulations of the Vermont Department of Public Safety, Division of Fire Services. The petitioner will ensure the Project uses appropriate safety guards and signage to prevent harm to the public, contractors, and employees alike.

Q23: Will the Project have an undue adverse effect on Existing or Planned Transmission Facilities under 30 V.S.A. § 248(b)(10)?

A23: No. The Project can be served by existing or planned transmission facilities without undue adverse effects on Vermont utilities or customers. The System Impact Study concluded that the Project will not have an adverse impact on LED's electric power system. **Ex. VRG-AS-4, LED System Impact Study**.

Q24: Is the Project a Woody Biomass Facility and, if so, does it achieve the highest design system efficiency that is commercially available, feasible, and cost-effective for the type and design of the proposed facility as set forth in 30 V.S.A. § 248(b)(11)(B)?

A24: This Project is a Farm Methane facility. It will convert lignocellulosic biomass waste into renewable fuel gas with a constituency of methane into electricity. It does not burn woody biomass for electricity. While the Project is therefore not a woody biomass combustion facility, it will be highly efficient at greater than 60% efficiency as a sum of full load design thermal output and electric output when divided by the heat input, as shown in Engineering Services of Vermont has conducted this calculation and certified it through a stamped report. Please see **Ex. VRG-AS-8, System Efficiency Certification**. This facility is highly efficient. Most biogas generators operate at efficiencies as low as 35% - 45%.

Q25: Does the Project comply with the applicable air pollution control requirements under the federal Clean Air Act 42 U.S.C. § 7401 et seq. as stated in 30 V.S.A. § 248(b)(11)?

A25: Yes, although this Facility does not combust woody biomass, the Project complies with the applicable air pollution control requirements under the federal Clean Air Act. Please see the prefiled testimony of **Maura Hawkins**.

Q26: While a farm methane facility, will the Project meet the harvesting standards as defined in § 248(b)(11) for feedstock which is derived from fiber growing operations where such fiber is timber?

A26: Yes, the harvesting procedures and procurement standards specific to feedstock sourced from timber growing operations will meet the minimum guidelines and standards developed under 10 V.S.A. § 2570. These standards have been officially published as the *Vermont Biomass Renewable Energy Standard, Tier II*. Please see **Ex. VRG-ED-1, Vermont Biomass RES**. Evan Dell'Olio and Eric Kingsley provide further context in their individual Prefiled Testimonies on this subject.

Q27: Is there a decommissioning plan for the Project as required under PUC Rule 5.900?

A27: Yes, I have prepared a decommissioning plan and cost estimate, submitted as **Ex. VRG-AS-9, Decommissioning plan and estimate**. As detailed in that plan, the Project will be decommissioned after 20 years of operation in accordance with the Standard Offer Power Purchase Agreement. Under this plan, all above-grade and below-grade portions of the facility as well as any improvements installed as part of the Project shall be removed from the site, and the site will be restored as close to original conditions as reasonably possible (including areas of Primary Agricultural Soils). This includes demolishing all concrete foundations and removing all crushed rock and asphalt installed as road surfacing. The site will be re-seeded with grasses consistent with the site's present condition. The estimated cost of decommissioning is $285,000.

Q28: Does this conclude your testimony?

A28: Yes.

Alexander Skorokhodov

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a Certificate of Public Good Pursuant to 30	)
V.S.A. § 248(j) for a Farm Methane Facility	)
in Lyndon, Vermont	)

DECLARATION OF ALEXANDER SKOROKHODOV

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 Tel Aviv, Israel this 23rd day of August, 2024.

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Alexander Skorokhodov