

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of VT Real Estate Holdings 2 LLC	)	
("Fair Haven Solar") for a Certificate of	)	
Public Good, pursuant to 30 V.S.A. § 248,	)	
authorizing the installation and operation of a	)	Case No. 24-____-PET
20 MW solar electric generation facility off	)	
Airport Road in Fair Haven, Vermont to be	)	
known as the "Fair Haven Solar Project"	)	

**PETITION OF VT REAL ESTATE HOLDINGS 2 LLC ("FAIR HAVEN SOLAR")
FOR A SECTION 248 CERTIFICATE OF PUBLIC GOOD**

NOW COMES VT Real Estate Holdings 2 LLC ("Fair Haven 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 Fair Haven Solar Project ("Project").

1. VT Real Estate Holdings 2 LLC, d/b/a Fair Haven Solar, is a Delaware limited liability company registered to do business in Vermont with principal offices at 58 Commerce Road, Stamford, CT 06902.
2. The Project is a proposed 20 megawatt ("MW") solar electric generation facility to be located in Fair Haven, Vermont. It is expected to generate approximately 35,950 megawatt hours (MWh) of electricity in its first year of operation.
3. The Project will be sited on 119 ($\pm$) acres across five parcels of land that total 825 (+/-) acres in Fair Haven, Vermont. *Exhibit FHS-RW-2*. The Project site is north of U.S. Route 4, east of Airport Road and Munger Road, and west of Scotch Hill Road.
4. The Project is generally sited on existing open fields.
5. Site access for construction and operation will be from Airport Road and Munger Road.
6. The Project will use Tier 1, high quality bi-facial solar panels mounted on single axis tracking racking installed so that the solar panels are tracking the sun east to west. The racking will be installed in rows running north-south. Electric power lines running from the solar panels will

be connected to eight central inverters, which will convert the DC electricity to alternating current. The power from each inverter will be fed to a co-located pad-mounted transformer with secondary containment that will step up the power to medium voltage (34 kV). The eight transformers will feed power to a single main three-phase 46 kV transformer at the Project substation via an electrical collection line that will run underground.

7. The Project substation will interconnect to Green Mountain Power's ("GMP") existing 46 kV transmission system via a new GMP substation to be located adjacent to the Project substation. GMP has filed a notice of its intent to build this new substation and will be seeking separate Section 248 approval.
8. The entire Project will be enclosed by fencing that meets the National Electrical Code.
9. Operation of the Project will be managed remotely and requires no full or part-time personnel to be on site. The Project will be continually monitored via the internet to confirm proper operation and performance. Energy metering will also be accomplished by remote telemetry.
10. The Project is expected to have a 30–40-year operational life. At the end of the Project's useful life, a determination will be made whether the Project can be re-powered (after any necessary regulatory approval), or whether it will be decommissioned.
11. At the time of decommissioning, all Project equipment will be dismantled and removed, and the site restored to its condition prior to the installation of the Project to the greatest extent practicable, all in accordance with Commission Rule 5.900.
12. The Project will help meet clearly demonstrated electricity needs in the New England region (including Vermont). It will alleviate the gap between needed and available capacity that the region will continue to face in the coming years.
13. The Project will be part of a diversified solution to the region's clean energy challenges as New England seeks to reduce its dependence on natural gas and other fossil fuel resources over

time. It will qualify as a Class I Renewable Energy Credit resource throughout New England and a Tier 1 resource within Vermont, thus addressing an ever-increasing demand for renewable energy resources to meet legislated targets.

14. The Project will add a source of zero-emissions electric generation to the New England generation mix, displacing tens of thousands of short tons of carbon dioxide (CO₂) emissions annually, or hundreds of thousands of short tons of CO₂ emissions over a 30-year operating life. Within the Project's first full year of operation, the avoided CO₂ emissions from the Project's generation will more than compensate for all the sequestered carbon dioxide equivalent released due to tree clearing during the construction phase of the Project.
15. The Project will result in substantial direct and indirect economic benefits to Vermont over its operating life, including millions of dollars in new income and gross domestic product for the State, and millions of dollars in state and municipal property taxes.
16. The Project will benefit the broader Vermont economy in ways that include employing Vermont businesses for the development work; purchasing Project equipment from Vermont companies where commercially feasible; and employing Vermont businesses for construction, installation, and maintenance work.
17. In support of this Petition, Fair Haven Solar submits prefiled testimony and exhibits that describe the Project and demonstrate compliance with each of the Section 248(b) criteria.

Request for Relief

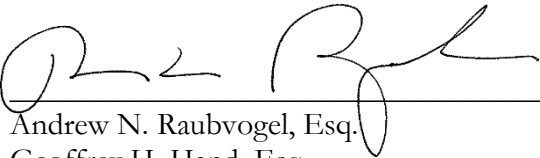
WHEREFORE, Fair Haven Solar respectfully requests the PUC to:

- 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 Fair Haven Solar shall be authorized to construct and operate a 20 MW solar electric generation facility in Fair Haven, Vermont, and that the Project will promote the general good of the State of Vermont, and authorize Fair Haven 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 17th day of September, 2024.

VT REAL ESTATE HOLDINGS 2 LLC

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