



Town of St. Albans Selectboard
Town of St. Albans Planning Commission
Northwest Regional Planning Commission
ePUC Statutory Entities
Adjoining Landowners

**Re: ER Dunsmore, LLC's 45-Day Notice to Persons
and Entities Entitled to Notice Pursuant to Public Utility Commission Rule
5.402(A), for a Proposed 5 MW Solar Array to be located off Dunsmore
Road in St. Albans Town, Vermont**

Dear State & Municipal Entities and other interested parties:

Pursuant to 30 V.S.A. § 248(f) and Vermont Public Utility Commission ("Commission" or "PUC") Rule 5.402(A), ER Dunsmore, LLC (the "Petitioner") is pleased to provide you with a renewal of the 45-Day notice in advance of filing a petition for a Certificate of Public Good ("CPG") with the Commission for a 5 MW solar electric generation facility to be known as the "Dunsmore Solar Project" (the "Project"). The Petitioner proposes to construct the Project on property located at 2642 Dunsmore Road in St. Albans Town, Vermont (the "Site").

This notice is a renewal of previous notice letters dated December 8, 2023 and September 2, 2022, and has been updated to be consistent with the requirements of Commission Rule 5.400.

Pursuant to Commission Rule 5.402, the following letter includes information sufficient to understand the overall Project, including the facility's location, a Project description, preliminary site plan, a description of how the Petitioner plans to transport equipment and materials to the site, and a preliminary identification and analysis of potential aesthetic and environmental impacts. This letter also describes the rights of the noticed parties to comment on the Project plans and participate in the Section 248 review process.

This letter contains descriptions of the following:

- I. 30 V.S.A. § 248 Process Information;
- II. Project Description;
- III. Site Selection & Location;
- IV. Construction and Transportation;
- V. Preliminary Assessment of Environmental and Aesthetic Impacts;
- VII. Project Benefits; and
- VII. Expected Filing Date.

Included as attachments to this letter are:

- A. Location Map / Preliminary Site Plan
- B. Preliminary Natural Resources Map

I. 30 V.S.A. Section 248 Petition and Notice

Under Commission Rule 5.402, the Petitioner is required to provide notice to certain entities and persons identified in that rule at least 45-days prior to filing a petition for a CPG with the PUC. These entities and persons include:

- the municipal legislative bodies and municipal and regional planning commissions in the communities where the project will be located;
- all Adjoining Landowners;
- the host landowner(s);
- the Department of Public Service;
- the Agency of Natural Resources;
- the Natural Resources Board;
- the Division for Historic Preservation;
- the Agency of Agriculture, Food and Markets; and
- the interconnecting utility.

Adjoining landowners to the Project were identified by using the Vermont Center for Geographical Information's online system and verified by the Town of St. Albans on November 25th, 2024.

Each planning commission has the right under 30 V.S.A. § 248(f)(1)(C) to submit recommendations to the Petitioner within 40 days of Petitioner's submittal to the planning commissions. Each municipal and regional planning commission has the right under 30 V.S.A. § 248(f)(1)(A) to convene a public hearing on the proposed petition.

The Petitioner's application to the Commission must address any written comments provided to the Petitioner in response to the 45-day advance submission that are related to the Section 248(b) criteria and any oral comments related to those criteria made at a public hearing conducted pursuant to 30 V.S.A. § 248(f)(1)(A).

Under 30 V.S.A. § 248(f)(1)(D), each planning commission has the right to make recommendations to the Commission after a petition is filed. The Commission will give due consideration to any such recommendations. Recommendations made to the Commission pursuant to this subsection, or the lack of such recommendations, shall not preclude municipal and regional planning commissions and municipal legislative bodies from exercising their right to appear as parties pursuant to 30 V.S.A. § 248(a)(4)(G)-(I).

Please send all recommendations during this 45-Day notice period to:

Vermont Public Utility Commission
c/o Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

AND

Encore Renewable Energy
Attn: Taegen Kopfler
50 Lakeside Avenue, Suite 110
Burlington, VT 05401
Tel: (802) 861-3023
taegen@encore.eco

For additional information regarding this process, including the Public's right to participate in the Public Utility Commission proceeding, please refer to the "Public Participation and Intervention in Proceedings Before the Public Utility Commission," found on the Commission's website at <https://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission>.

Because the Petitioner plans to file the petition under Section 248, please see Commission's Section 248 procedures document, found on the Commission's website at <https://puc.vermont.gov/document/section-248-procedures>.

II. Project Description

The Petitioner is proposing a 5 MW solar electric generation project located on property at 2642 Dunsmore Road in St. Albans Town, Vermont. The array will occupy roughly 30 acres of the greater 152-acre parcel and will be set back approximately 1,600 feet from Dunsmore Road. The electricity generated by this Project will flow to Green Mountain Power's ("GMP") electric grid.

The Site location, array footprint, and approximate property boundaries are shown in the preliminary site plan provided as *Attachment A*. In summary, the Project will consist of:

- Approximately 12,000 solar panels installed on ground-mounted racking systems across roughly 30 acres of the Site:
 - Coated with non-reflective glazing
 - Approximately 10-15 feet off the ground at their highest point
 - Mounted on Single Axis Tracking racking systems in rows running north-south, with the racking system rotating on the north-south oriented axis to track the sun throughout the day;
- A network of string inverters dispersed across the array and connected with underground cables installed in protective conduit;
- A 7-8 ft agricultural style perimeter fence;
- Temporary laydown area for delivery and short-term storage of materials;

- An approximately 1,600-ft extension of 3-phase power to the Site for interconnection into GMP's grid, from the existing distribution service on Dunsmore Road;
- An approximately 1,600-ft existing access road to provide access to the solar site.

III. Site Selection

This Site was selected because of its distance from the nearest roads and residences, proximity to a three-phase electric utility line, even topography, and limited environmental impacts.

The Petitioner has worked with its consultants to configure the Project in a way that would maximize the potential energy generation benefits while minimizing environmental and aesthetic impacts. The Petitioner will continue working with all stakeholders prior to filing the CPG petition and thereafter to address any concerns.

IV. Construction & Transportation

The Petitioner proposes to deliver materials for the Project using trucks and state and local roads, including Dunsmore Road, which are accustomed to the type of traffic representative of the proposed daily delivery of materials. Deliveries will be made to a temporary construction staging area on the Site, located off the proposed access drive near the Project entrance. Most all transportation activity will occur during the construction phase, which would last between three and five months.

The Project is not expected to require oversize or overweight deliveries. Access to and from the Site will be restricted by perimeter fencing in order to secure the Site and prevent the public from entering the facility. All equipment associated with the Project will be installed in accordance with all applicable regulations and electrical codes.

V. Preliminary Impact Assessment

i. Aesthetics

In preparation for this 45-Day Notice, the Applicant engaged T.J. Boyle Associates of Burlington, Vermont to perform a preliminary review of potential aesthetic impacts resulting from the Project. Filtered views of the Project will be possible from the north and east of the site. The Project is proposed within an existing field, where existing hedgerows and vegetated areas currently buffer the site from areas to the north and east. The Project is setback approximately 830 feet from the nearest residential structure to the north, and at its closest point is approximately 1,500 feet south of Lower Newton Road. Dunsmore Road lies approximately 1,600 feet to the east at the nearest point. Existing vegetation, combined with the large distances from which the Project may be viewed, provide substantial screening of the Project. Where it may be visible behind the existing hedgerow, the array will be low in elevation, and the Project will not be a dominant feature in the landscape.

Overall, preliminary findings by TJ Boyle indicated that the Project would not result in undue impacts to the aesthetic and scenic and natural beauty of the area and no mitigation landscape measures are necessary given the limited viewshed and long viewing distances. The Petitioner will continue to work with St. Albans Town, adjoining property owners, and T.J. Boyle Associates in order to address any potential aesthetic impacts. The Petitioner will file the complete TJ Boyle aesthetic report, and final mitigation measures, where warranted, with the complete petition.

ii. Environmental

The Petitioner has engaged VHB, Inc. to perform preliminary due diligence as well as detailed natural resource assessments and delineations, including both database and field surveys. The Petitioner will provide the results of those studies in the final petition.

Given that the Project is located within an existing agricultural field, the likelihood of impacts to most natural resources is low. VHB will conduct natural resource assessments, and impact analyses (where applicable) will be completed for criteria considered under Section 248 and as relevant to any additional necessary environmental permitting.

The Petitioner will consult with state and federal agency staff as necessary pending results of detailed natural resource studies, which will inform Project design to avoid resources where possible and/or secure necessary permits, reviews, and approvals.

VI. Project Benefits

The Project will provide locally generated renewable energy for Vermont, and will contribute to the achievement of GMP's and the State of Vermont's renewable energy objectives. The Project will also result in new state and municipal tax revenue and other economic benefits.

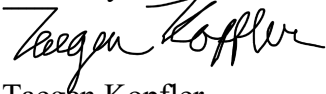
VII. Conclusion

The Project is not expected to result in undue adverse impacts to the applicable criteria. The Petitioner looks forward to submitting the full Section 248 petition package, which will contain all of the information required by the PUC to evaluate the merits of the Project for potential award of a CPG, and inform others of the Project's impacts and value.

The Petitioner intends to file a Section 248 Petition and supporting materials with the PUC soon after the expiration of the 45 day notice period, which is expected to be no sooner than February 3, 2025.

We look forward to receiving any input or suggestions you may have as we move through the Section 248 process. If you have any questions, you may direct them to the Petitioner by phone at 802-861-3023 or by email at taegen@encore.eco.

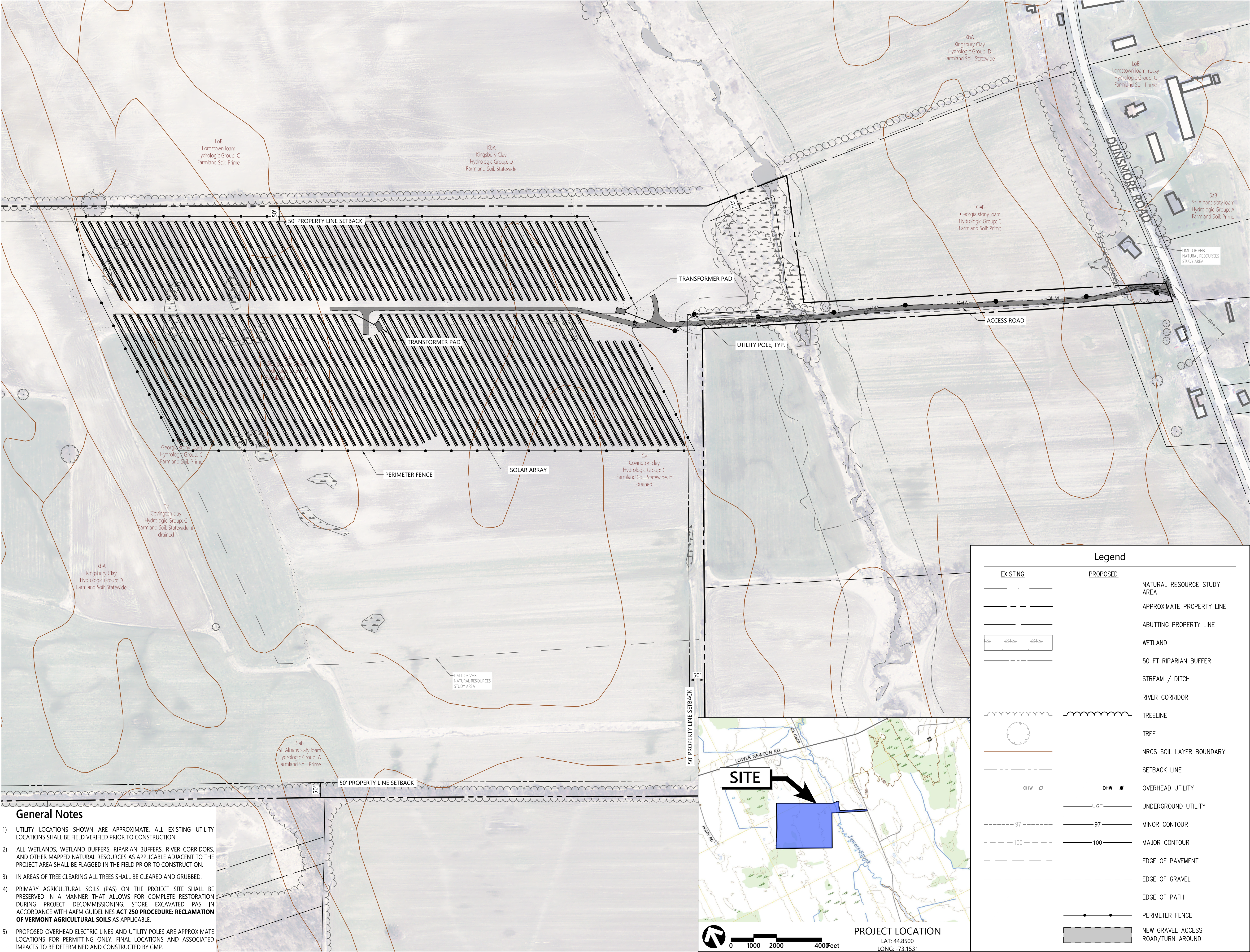
Sincerely,

A handwritten signature in black ink, appearing to read "Taegen Kopfler". The signature is fluid and cursive, with the first name "Taegen" and last name "Kopfler" clearly distinguishable.

Taegen Kopfler
Project Development Manager
Encore Renewable Energy

Attachment 1 – Preliminary Site Plan

Attachment 2 – Preliminary Natural Resources Map



ER Dunsmore, LLC
2642 Dunsmore Rd.
St. Albans, VT

No.	Revision	Date	Appvd.

Designed by	PLU	Checked by	SMW
Issued for		Date	December 17, 2024

Review

Not Approved for Construction

Drawing Title

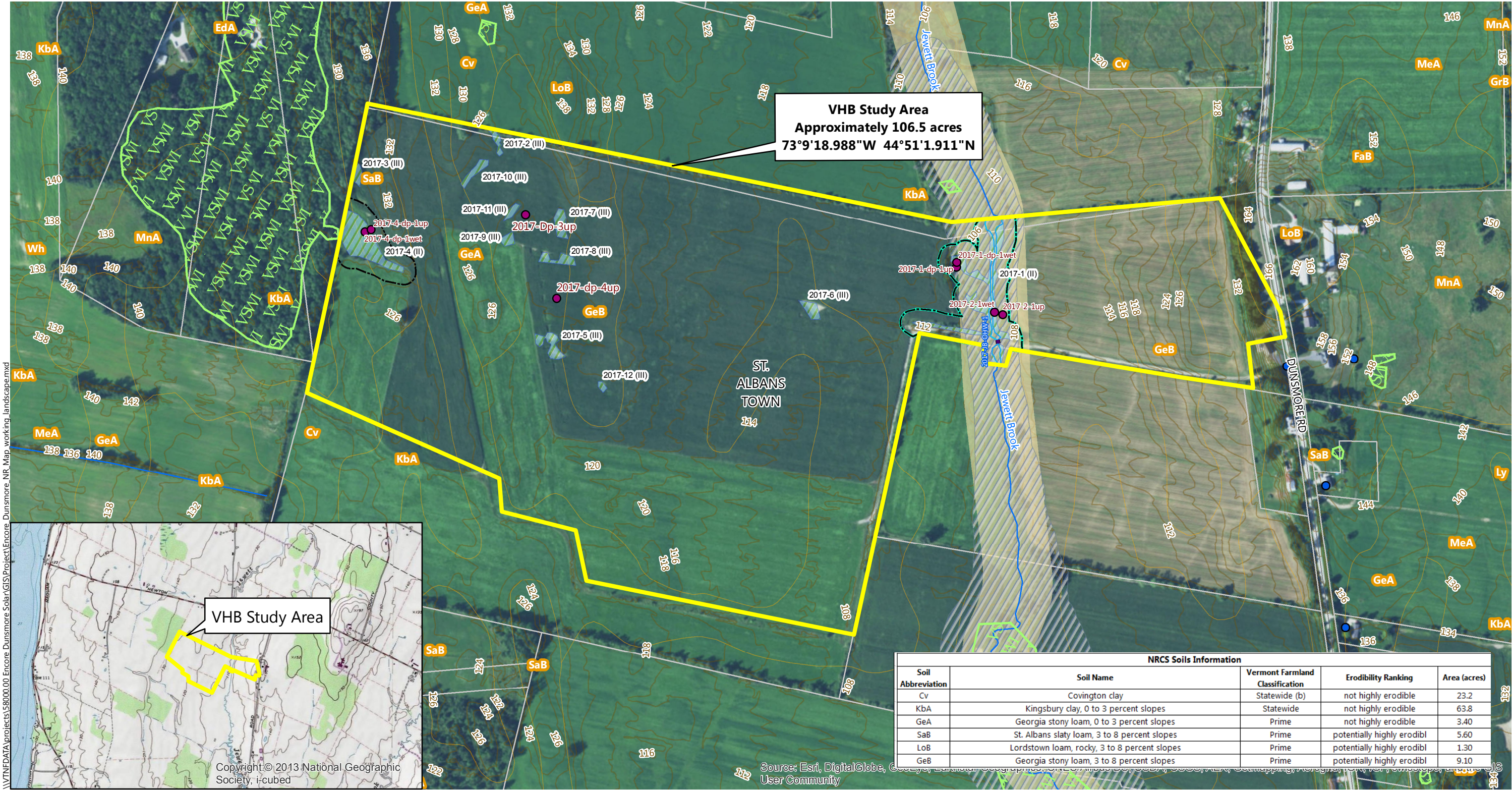
Preliminary Site Plan

Drawing Number

C1.00

Sheet 1 of 1

Project Number
57818.02-5300



Legend

- Study Area (VHB/ERE)
- VHB Delineated Wetland (VHB)
- VHB Delineated Stream (VHB)
- Delineation Data Point (VHB)
- Found Culvert (VHB)
- Riparian Buffer (VHB)
- Class II Wetland Buffer (VHB)
- VSWI Wetland (ANR, 2014)
- Stream (VHD, 2013)
- 100 Year Flood Zone (FEMA)
- River Corridor (ANR, 2015)
- Public Wells (ANR, 2017)*
- Private Wells (ANR, 2016)
- GW Protection Area (ANR, 2017)*
- SW Protection Area (ANR, 2017)*
- NHI Element Occurrence (FWD)*
- Bear Habitat (FWD, 2015)*
- Deer Wintering Area (ANR, 2010)*
- Soils (NRCS, 2017)
- County Boundary (VCGI, 2012)*
- Town Boundary (VCGI, 2016)*
- Parcel Boundary (VCGI, 2017)
- Interstate*
- US Highway*
- State Highway*
- Town Road
- Contour - 2-foot (VCGI)

*Indicates feature is not present within map extent

Encore - Dunsmore Road Solar Project | St. Albans, Vermont

Sources:
Background Imagery by ESRI (2017)
ANR (Vermont Agency of Natural Resources - Various Dates)
FWD (Vermont Department of Fish and Wildlife - Various Dates)
VOGP (Vermont Open Geodata Portal - Various Dates)
VTrans (Vermont Agency of Transportation - 2016)
VHB (2017)
Wetlands/Waters delineated by VHB on September 26, 2017 and October 11 and 17, 2017
VHB's proposed wetland classifications are base on VWR Section 4.6 (Presumptions) and are subject to ANR-DEC review.

DRAFT: Natural Resources Map