

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of ER Dunsmore, LLC for a Certificate of                    )  
Public Good pursuant to 30 V.S.A. § 248, authorizing                )  
the installation and operation of a 4.95 MW solar                    )     Case No. 25-\_\_\_\_-PET  
electric generation facility off Dunsmore Road in the                )  
Town of St. Albans, Vermont                                                )

**PETITION FOR CERTIFICATE OF PUBLIC GOOD**  
**PURSUANT TO 30 V.S.A § 248**

By this Petition, ER Dunsmore, LLC (“DRS” or “Petitioner”) requests that the Public Utility Commission (“Commission”) issue a Certificate of Public Good (“CPG”) pursuant to 30 V.S.A. § 248 for the installation and operation of a 4.95 MW solar photovoltaic electric generation facility off Dunsmore Road in St. Albans, Vermont. In support of this Petition, DRS represents:

1.       DRS is a Vermont limited liability company with a business address of 50 Lakeside Ave #110, Burlington, Vermont, 05401.
2.       DRS proposes to install and operate the Project on approximately 30 acres of a parcel of land off Dunsmore Road in St. Albans, Vermont (the “Property”).
3.       The Project consists of approximately 12,425 non-reflective photovoltaic modules installed on single axis tracker racking units within a perimeter fence. The Petitioner proposes to install an approximately 8’ high agricultural style wire-knot perimeter fence around the array.
4.       Electricity will run from the panels in direct current (DC) to a network of string inverters within the array, before being converted to alternating current (AC). Electricity from the array will run underground to two 2,500 kVA pad-mounted transformers. From the transformers, the electricity will continue to run underground for a portion beyond the fence line of the Project before transitioning overhead to a series of eight new utility poles. The electricity

will travel overhead along the poles to an existing pole on Dunsmore Road where the Project will interconnect to the Green Mountain Power system.

5. The Petitioner will access the Property from an existing access driveway off Dunsmore Road. The Petitioner will widen, re-align, and improve the existing access driveway, and extend the access drive into the middle of the Project site.

6. DRS submitted pre-filing notice to the required parties at least 45 days prior to filing this petition in compliance with Commission Rule 5.402.

7. DRS will provide notice of the proposed Project under Rule 5.407 to adjoining landowners upon receipt of notice of a complete petition.

8. In support of this Petition, DRS submits supporting prefiled testimony and exhibits that address each of the § 248(b) criteria by the following witnesses: Taegen Kopfler, Stephanie Wyman, Adam Crary, Britta Tonn, and Jeremy Owens. An index of evidence identifying the evidence pertaining to each criteria is provided with this Petition pursuant to Rule 5.403(A)(16).

9. As explained in the supporting testimony and exhibits, the proposed Project meets the criteria established by 30 V.S.A. § 248, including the applicable environmental criteria incorporated from Title 10 of the Vermont Statutes Annotated pursuant to 30 V.S.A. § 248(b)(5), and will promote the general good of the State of Vermont.

**Request for Relief**

WHEREFORE, DRS respectfully requests the Commission to:

1. Hold a prehearing conference as expeditiously as possible on the Petition;
2. Hold evidentiary hearings, as the Commission determines necessary;
3. Make findings as required by 30 V.S.A. § 248 and *Section 8007(b) Order*, that

DRS shall be authorized to construct and operate a 4.95 MW solar electric generation facility off Dunsmore Road in St. Albans, Vermont and that the Project will promote the general good of the State of Vermont; authorize DRS to undertake the actions described herein and in the attached testimony and exhibits; and issue a Certificate of Public Good to that effect; and

4. Take such other actions as may be required for the expeditious review and approval of this Petition.

DATED at Burlington, Vermont, this 5<sup>th</sup> day of May, 2025.

ER Dunsmore, LLC

By:



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Victoria M. Westgate, Esq.  
Zachary R. Berger, Esq.  
SRH Law PLLC  
91 College Street, P.O. Box 545  
Burlington, Vermont 05402-0545  
vwestgate@srhlaw.com  
zberger@srhlaw.com  
(802) 860-1003