

**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 AC solar
electric generation facility off Dunsmore
Road in the Town of St. Albans, Vermont

)
)
)
)
)
)
)

Case No. 25-____-PET

PREFILED DIRECT TESTIMONY OF BRITTA TONN

May 5, 2025

Summary: Ms. Tonn’s testimony addresses the Project’s compliance with the Section 248(b)(5) criterion for historic resources.

Exhibit List

DRS-BT-1:	Resume
DRS-BT-2:	Historic Resources Report

Introduction

Q1. Please state your name, current employer, business address, and position.

A1. My name is Britta Tonn. I am a Director of Cultural Resources at Vanasse Hangen Brustlin, Inc. (“VHB”). My business address is 40 IDX Drive, Building 100, Suite 200, South Burlington, Vermont.

Q2. Please describe your professional background, qualifications, and experience.

A2. I am a Secretary of the Interior (“SOI”)-qualified (36 CFR Part 61) Architectural Historian, meeting the education and experience required to perform identification, evaluation, registration, and treatment activities related to historic properties. I hold an M.S. in Historic Preservation from the University of Vermont (“UVM”), Burlington, VT (2010) and a B.A. in the History of Art and Architecture from Middlebury College, Middlebury, VT (2002). I have worked as an architectural historian and preservation planner in the field of historic preservation since 2010. Over the past fifteen years, I have completed historic resources assessments for a variety of projects requiring review under Section 248(b)(5) including solar installations and telecommunications facilities. My resume is attached as *Exhibit DRS-BT-1*.

Q3. Have you testified previously before the Public Utility Commission (“PUC”)?

A3. Yes, I have provided prefiled testimony in the following cases: Bromley Solar Project (Case No. 19-2680-NMP), Gaskill Road / VT-VT-0023A (Case No. 21-3127-PET), AT&T SR# VT-104 (Case No. 20-3260-PET), Shaftsbury Solar (Case No. 23-1447-

PET), and Fair Haven Solar (Case No. 24-2945-PET). I have also provided technical support and expertise for solar installations in the form of historic resources assessment reports for the following cases: Outback Acres Solar Project (Case No. 22-2423-AN), Adams Road Solar Project (Case No. 21-4787-PET), and Ethan Allen Solar Project (Case No. 21-1051-PET).

Q4. What is the purpose of your testimony?

A4. My testimony addresses the ER Dunsmore Solar Project's compliance with the Section 248(b)(5) criterion regarding above-ground historic resources.

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

A5. I completed a Historic Resources Assessment to evaluate the effects of the Project on above-ground resources, which included both desktop and field research. A memorandum describing in detail the assessment and my conclusions with respect to the Project's potential for impacts on above-ground historic resources is provided in *Exhibit DRS-BT-2*.

SECTION 248 CRITERIA

Historic Sites (30 V.S.A. § 248(b)(5))

Q6. Are there any above-ground historic resources on the site, and if so, will the Project cause any undue adverse impacts to such resources?

A6. No. There are no above-ground historic sites on the Project parcel.

1 **Q7. Are there any above-ground historic resources located off-site that could be**
2 **impacted by the Project? If so, will the Project cause any undue adverse impacts to**
3 **such resources?**

4 A7. There are two historic sites within the Area of Potential Effect (“APE”) of the Project that
5 are eligible for the State Register. I evaluated the potential for Project impacts on both
6 sites and conclude that the Project will not result in adverse impacts to either property
7 given the distance, intervening vegetation, and location of the sites on the eastern side of
8 Dunsmore Road (opposite of the Project parcel). For both sites, the Project and the
9 property will not be visible within the same field of view when seen from Dunsmore
10 Road. For these reasons, it is my professional opinion that the Project will not result in an
11 adverse impact on any above-ground historic resources and that the Project complies with
12 this Section 248 criterion.

13
14 **Q8. Does this conclude your testimony at this time?**

15 A8. Yes.