

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. ____

Williston G Katie Lane Solar, LLC's Petition for a
Certificate of Public Good in accordance with
30 V.S.A. § 248 regarding a proposed 2.9 MW
ground-mounted solar array located off
Mountain View Road in Williston, Vermont.

**PREFILED TESTIMONY AND DECLARATION OF
JAKE CLARK
ON BEHALF OF
WILLISTON G KATIE LANE SOLAR, LLC**

This document and supporting exhibits have been filed ePUC

Summary of Testimony

Mr. Clark's testimony provides an overview of the Petitioner's plans to install and operate a 2.9 MW solar electric generation facility located off Mountain View Road in Williston, Vermont ("Project"). It also describes the proposed Project's relationship to certain criteria set forth in 30 V.S.A. § 248: orderly development of the region (§ 248(b)(1)); need (§ 248(b)(2)); system stability and reliability (§ 248(b)(3)); economic benefit to the State and its citizens (§ 248(b)(4)); public health and safety, air pollution, use of natural resources, greenhouse gas impacts (§ 248(b)(5)); transportation systems (10 V.S.A. § 6086(a)(5)); educational services (10 V.S.A. § 6086(a)(6)); municipal services (10 V.S.A. § 6086(a)(7)); historic sites (10 V.S.A. § 6086(a)(8)); development affecting public investments (10 V.S.A. § 6086(a)(9)(K)); integrated resource plan (§ 248(b)(6)); compliance with electric energy plan (§ 248(b)(7)); impact on Vermont utilities and customers (§ 248(b)(10)); setbacks (§ 248(s)); and decommissioning plan and fund (Public Utility Commission Rule 5.900).

Introduction

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

My name is Jake Clark, and I am currently the Vice President of Development at Encore Renewable Energy (“Encore”). My business address is 50 Lakeside Avenue, Suite 110, Burlington, VT 05401. As a certified B-Corp, Encore is a leading integrated clean energy project development company with a focus on commercial, industrial, and community-scale solar PV systems for Vermont towns, schools, businesses, and landowners. We also assist a variety of clients in navigating complex technical, financial, and regulatory matters through various stages of development. Encore is assisting Williston G Katie Lane Solar, LLC (“WGKL Solar” or “Petitioner”) with these proposed Projects.

Q2. Please describe your educational background and work experience.

A2. I have worked at Encore since 2019. Prior to this role, I was special counsel at the Vermont Department of Public Service where I worked on a variety of certificate of public good matters. Before working for the Department of Public Service, I worked for several years as a contract attorney in the energy regulatory sector. My undergraduate degree is in mechanical engineering, and I worked in construction management on large scale (\$70MM - \$250MM) projects before earning my law degree. My resume is attached as Exhibit WGKL-JC-1.

1 Q3. Who is the Petitioner and what is their address?

2 A3. As stated above, the Petitioner is Williston G Katie Lane Solar, LLC. The Petitioner's
3 mailing address is 50 Lakeside Avenue, Suite 110, Burlington, VT 05401. The Petitioner
4 is a Vermont limited liability company in good standing.

5
6 Q4. Have you testified previously before the Public Utility Commission ("Commission" or
7 "PUC")?

8 A4. ^[OBJ.] Yes. I have provided testimony in several closed cases before the Commission.
9 These include approved solar generation projects, Case No. 24-1024-PET, Case No. 22-
10 1644-PET, Case No. 22-3427-PET, Case No. 22-2628-PET, Case No. 20-1219-PET. I have
11 also provided testimony in Case No. 21-2114-PET and 21-3022-PET, approved battery
12 energy storage projects.

13
14 Q5. What is the purpose of your testimony?

15 A5. My testimony supports WGKL Solar's Petition for a Certificate of Public Good ("CPG")
16 pursuant to 30 V.S.A § 248 with respect to the Petitioner's proposal to install and operate
17 a 2.9 MW ground mounted solar electric generation facility known as the Williston G Katie
18 Lane Solar Project in Williston, Vermont (the "Project"). I provide a Project overview and
19 specifically address the following Section 248 criteria: orderly development of the region
20 (§ 248(b)(1)); need (§ 248(b)(2)); system stability and reliability (§ 248(b)(3)); economic
21 benefit to the State and its citizens (§ 248(b)(4)); public health and safety, air pollution, use
22 of natural resources, greenhouse gas impacts (§ 248(b)(5)); transportation systems (10

1 V.S.A. § 6086(a)(5)); educational services (10 V.S.A. § 6086(a)(6)); municipal services
2 (10 V.S.A. § 6086(a)(7)); historic sites (10 V.S.A. § 6086(a)(8)); development affecting
3 public investments (10 V.S.A. § 6086(a)(9)(K)); integrated resource plan (§ 248(b)(6));
4 compliance with electric energy plan (§ 248(b)(7)); impact on Vermont utilities and
5 customers (§ 248(b)(10)); setbacks (§ 248(s)); and decommissioning plan and fund (Public
6 Utility Commission Rule 5.900). Witness Adam Crary will address: 30 V.S.A. § 248(b)(8)
7 and 10 V.S.A. § 1424a(d) outstanding resource waters; 30 V.S.A. § 248(b)(5) natural
8 environment; 10 V.S.A. § 6086(a)(1) water and air pollution; 10 V.S.A. § 6086(a)(1)(A)
9 headwaters; 10 V.S.A. § 6086(a)(1)(B) waste disposal; 10 V.S.A. § 6086(a)(1)(C) water
10 conservation; 10 V.S.A. § 6086(a)(1)(D) floodways; 10 V.S.A. § 6086(a)(1)(E) streams;
11 10 V.S.A. § 6086(a)(1)(F) shorelines; 10 V.S.A. § 6086(a)(1)(G) wetlands; 10 V.S.A. §
12 6086(a)(2) & (3) water supply; 10 V.S.A. § 6086(a)(4) soil erosion; 10 V.S.A. § 6086(a)(8)
13 rare and irreplaceable natural areas, necessary wildlife habitat, endangered species; and 10
14 V.S.A. § 6086(a)(9)(B) primary agricultural soils. Witness Jeremy Owens will address 30
15 V.S.A. § 248(b)(1) (orderly development and municipal screening) and (5) (aesthetics) and
16 10 V.S.A. § 6086(a)(8) aesthetics and landscape mitigation pursuant to PUC Rule 5.800.

17
18 **Project Description and Overview**

19 Q6. Please generally describe the proposed Project.

20 A6. WGKL Solar proposes to install and operate the Project as two closely located sub-arrays
21 on approximately 11.1 acres of a 440-acre parcel of land located off Mountain View Road
22 in Williston, Vermont (the “Property”), on tax parcel ID 04-010-027-000 (Tax ID 759-241-

1 11611). The Petitioner has rights to lease the portions of the host Property necessary for
2 the Project.

3
4 The Project was initiated and designed with the intent of providing GlobalFoundries
5 (“GF”), the sole customer of PUC-regulated electric utility GF Power LLC (“GF Power”),
6 with a source of local solar energy generation to help it achieve its renewable energy goals.
7 The Project is also being undertaken to help GF Power comply with Vermont’s Renewable
8 Energy Standard (“RES”), 30 V.S.A. §§ 8004-8005, including requirements for the utility
9 to purchase distributed renewable energy from plants 5MW or less in an amount equal to
10 a specified percentage of GF Power’s load¹. GlobalFoundries is a world leader in feature-
11 rich semiconductor manufacturing with a strong commitment to sustainable and
12 environmentally efficient operations. The use of onsite renewable energy has significant
13 advantages including the stabilization of energy costs and meeting the growing
14 expectations of GF customers to produce products using renewable energy.

15
16 The Project is structured so that the Petitioner plans to sell the output of the solar Project
17 to GF Power under a Power Purchase Agreement (“PPA”) at a competitive rate of
18 \$1.066/kwh. The PPA is on file with the Commission in Case No. 25-0606-PPA, which

¹ For further discussion please see *Petition of Encore Renewable Energy for a declaratory ruling regarding whether several potential solar projects are separate plans and qualify as Tier II resources under Rule 4.400 and 30 V.S.A. § 8005* Case No. 23-3974-PET, Declaratory Ruling Regarding the Applicability of the Definition of Tier II Resources Under Vermont’s Renewable Energy Standard to Certain Potential Solar Facilities (Jan. 26, 2024).

1 has been closed after no comments on the PPA were received by the Commission during
2 the Rule 5.200 ninety-day notice period.

3
4 The electricity generated by the project will be interconnected into existing distribution
5 service along Mountain View Road, and GF Power will take that electricity through
6 existing connections between GMP distribution service and GF Power.

7
8 Q7. Was the Project identified as “potential solar facility” in the Commission’s Declaratory
9 Ruling in Case No. 23-3974²?

10 A7. Yes, the Project that is the subject of this Petition was identified as Project G in the
11 Commission’s Declaratory Ruling.

12
13 Q8. Are the Project plans as submitted in the Petition for this case identical to the plans
14 submitted in Case No. 23-3974 with respect to the factors that define a single plant?

15 A8. Yes, the plans are identical with respect to the factors that define a single plant as
16 interpreted and applied to the evidence presented in Case No. 23-3974. There is one change
17 that is not material to the Commission's single-plant analysis: in case No. 23-3974-PET,
18 Project G was identified as being "approximately 3 MW." In this Petition, the Project seeks
19 a CPG to generate up to 2.9 MW AC.

20

² Id.

1 Q9 Who will retain ownership of the environmental attributes?

2 A9. The RECs associated with this Project will be transferred to GF Power pursuant to the PPA
3 between Petitioner and GF Power.
4

5 Q10. Please generally describe the site plan and specific Project equipment.

6 A10. The Project consists of approximately 6,550 non-reflective photovoltaic modules installed
7 on fixed tilt (“FT”) racking units spread across two subarrays on the approximate 11-acre
8 Project area. Please see Exhibit WGKL-JC-2 for a site plan. The approximately 51 rows of
9 panels comprising the solar array range in length and run generally east-west, are oriented
10 predominantly to the south, and are fixed at around 25 – 30 degrees. Racking systems will
11 be approximately 3 feet tall on the low side and 10-15 feet tall on the high side and installed
12 on driven post foundations, generally without the use of concrete. Please refer to Exhibit
13 WGKL-JC-3 for typical equipment specifications for the Project. The final site design and
14 equipment selection will occur post-permit issuance, however such design will be
15 substantially the same as shown in Exhibit WGKL-JC-2.
16

17 For each of the two sub-arrays, electricity will run from the panels in direct current (DC)
18 to a network of string inverters, which are UL1741-SA compliant, dispersed among the
19 array, before being converted to alternating current (AC). Cabling will then run-in
20 protective conduit to a switchgear, which will include the data acquisition system and other
21 auxiliary equipment. Electricity will then run underground to a 1600 kVA pad-mounted

1 transformer with secondary oil containment for the northern sub-array, and a 1400 kVA
2 pad-mounted transformer with secondary oil containment for the southern sub-array.

3 From the northern sub-array, the project proposes to install 9 new overhead poles with
4 wires on the Global Foundries property originating at the access gate of the northern sub-
5 array and then extending to the south along the access road to the southern sub-array,
6 proximal to the transformer and equipment pad for the southern sub-array. From this point,
7 the interconnection will transition to underground electric, crossing underneath the access
8 road to the western side of the access, and connecting to existing GMP-owned distribution
9 poles near the access road's intersection with Mountain View Road. This is the point of
10 interconnection with GMP.

11
12 The Project will have its own protective reclosers and pad-mounted primary meters before
13 being coupled at a terminating cabinet and protective switchgear.

14
15 Q11. How will Petitioner and other authorized personnel access the Project?

16 A11. The Petitioner will access the Property via Mountain View Road (state highway) and Katie
17 Lane (a privately owned access drive on the property owned by Global Foundries).

18 Additional details are shown on Exhibit WGKL-JC-2.

19

1 Q12. Will the Project involve any tree work?

2 A12. Yes. The petitioner proposes to clear approximately 0.03 acres of tree clearing. Please see
3 the testimony of Adam Crary and accompanying Exhibit WGKL-AC-2 for additional
4 details on tree work. Additional details are shown on Exhibit WGKL-JC-2.

5
6 Q13. Does the Petitioner propose to install a fence? If so, please describe the fence.

7 A13. Yes. The Petitioner proposes to install an approximate 7-8' high agricultural style wire-
8 knot perimeter fence affixed to driven fence posts. The perimeter fencing would restrict
9 access to and from the Project to secure the Project and prevent the public from entering
10 the array. The Petitioner will install a secured gate where the fence meets the access road
11 for the southern array, on the western extent of the project, near the location of the
12 transformer and equipment pad. The Petitioner will install a secured gate where the fence
13 meets the access road for the northern sub-array, at the southern extent of the project, near
14 the location of the transformer and equipment pad. GMP and first responders will be
15 provided with access through the gate. Exhibit WGKL-JC-3 includes a representative fence
16 specification sheet.

17
18 Q14. Is the Petitioner proposing a lighting plan for the Project?

19 A14. No, the Petitioner does not require lighting for any aspect of the Project and thus does not
20 propose a lighting plan for the Project.

21

1 Q15. Will the Project require grading?

2 A15. The Project will not require landform grading or changes to site topography. Minimal
3 earthwork will be involved for the installation of the access drives, underground conduit,
4 necessary equipment pads for transformers, and associated stormwater treatment
5 improvements. The access road proximate to the northern sub-array crosses an existing
6 culvert over an intermittent stream / drainage. This culvert will need to be replaced so that
7 the access road can be widened and improved to sustain the needs of the construction of
8 this project and the continued access for maintenance and operation over the life of the
9 project.

10 Q16. Will the Project require installation of any components containing oil?

11 A16. Yes. The WGKL Solar Project includes one 1600 kVA pad mount transformer (northern
12 sub array) and one 1400 kVA pad mount transformer (southern sub-array) that uses a
13 biodegradable dielectric fluid. The Site Plan (Exhibit WGKL-JC-2) shows the location of
14 the proposed transformers and Exhibit WGKL-JC-3 includes transformer specifications.
15 The Petitioner also proposes to install a secondary oil containment system sufficient to hold
16 a minimum of 110% of the transformer coolant volume plus five inches of free board for
17 the transformer. For more information, please see the testimony of Stephanie Wyman
18 regarding waste disposal.

19
20 Q17. Please explain the proposed construction process and schedule.

21 A17. WGKL Solar, and GF Power are planning to have the Project in service by Q3 of 2027. To
22 meet this date, procurement would need to begin by Q2 of 2026, which cannot occur until

1 the CPG is issued, and construction would commence by Q4 of 2026. Construction
2 activities, which will span over a 4–7-month duration, primarily include: (1) preparation of
3 the site and installation of the staging area, (2) installation of racking and panels, (3)
4 installation of inverters, electrical connections, and (4) installation of transformers and
5 network upgrades. Many of these tasks can be performed concurrently over the 4–7-month
6 schedule, however they are dependent on weather among other variables.

7
8 Construction activities and related deliveries will be limited to 7:00 A.M. - 6:00 P.M. on
9 weekdays; 8:00 A.M. - 5:00 P.M. on Saturdays and no construction on Sundays or state or
10 federal holidays.

11
12 Q18. What are the Project’s operation and maintenance activities?

13 A18. Once the Project is fully commissioned, operations and maintenance activities will be
14 minimal. The Petitioner will perform routine system performance two to four times per
15 year, which will consist of vegetation management, and mechanical and electrical
16 inspections. The Petitioner will remotely monitor operations, and in the event of a system
17 malfunction, personnel will visit the site for troubleshooting or repairs.

18
19
20 **Section 248 Criteria**

21 **Orderly Development of the Region**
22 (30 V.S.A. § 248(b)(1))

23 Q19. Please identify what portion of this criterion you address.

1 A19. I address the recommendations provided by the municipal legislative bodies, and regional
2 and local planning commissions. Witness Jeremy Owens addresses the applicable town
3 and regional plans and whether municipal screening ordinances apply.
4

5 Q20. Please describe any public outreach efforts, and address the substantive written comments
6 related to the Section 248(b) criteria that the Petitioner received within 45-days of
7 submitting the advance notice as required by Section 248(f)(2)?

8 A20. The Petitioner provided the Chittenden County Regional Planning Commission
9 (“CCRPC”), and the Town of Williston Selectboard and Planning Commission with 45-
10 day advance notice packages under Rule 5.402(A) on January 29, 2025. See Exhibit
11 WGKL-JC-4 (45-day notice comments). The Petitioner also provided the 45-day advance
12 notice to the entities and persons identified in Commission Rule 5.402.
13

14 The Petitioner has been actively engaged with the Town, and the CCRPC. After submitting
15 the 45-day notice, WGKL consulted with the Town and CCRPC to solicit feedback, which
16 initiated a meeting with the Town Planning Commission and its staff on April 15, 2025.
17 Subsequent to Encore’s meeting with the Williston Planning Commission the Williston
18 Planning Commission filed written comments with the PUC in Case No. 25-0211-AN. The
19 comments in the Planning Commission’s written submission to the PUC captured the
20 essential substance of the Project-specific discussion I had with the Town Planning
21 Commission in person. The comments addressed the Project’s compliance with the Town’s
22 2016 Comprehensive Plan and Enhanced Energy Plan, expressed strong support for the

1 Project, and included requests for Petitioner to address certain natural resource issues and
2 the placement of utility lines in the Petition package. With regard to the utility line
3 placement, I have addressed that issue in my testimony within the site plan description on
4 pages 7-10 and additional responsive information is in the site plan Exhibit WGKL-JC-2.
5 Regarding the natural resources issues, Mr. Crary's testimony and his Exhibit WGKL-AC-
6 2 address the wetland and wildlife habitat-habitat related comments from the Williston
7 Planning Commission with additional information on wildlife habitat issues supplied in
8 Mr. Owens' Exhibit WGKL-JO-2.

9 Q21. Has the Chittenden County Regional Planning Commission (CCRPC) developed an
10 opinion on the Project? Please describe any interactions the Applicant has had with the
11 Chittenden County Regional Planning Commission.

12 A21. On March 6, 2025, the CCRPC filed comments with the PUC in response to Petitioner's
13 45-day notice. The CCRPC indicated the Project's consistency with energy goals and
14 actions and siting suitability standards contained in the CCRPC's 2018 Chittenden County
15 ECOS Plan, which gained a Determination of Energy Compliance from the Vermont DPS
16 on August 9, 2018. The comments also identified the presence of "Known" and "Possible
17 Constraints" on the Project, including the nearby presence of a rare, threatened, or
18 endangered plant, the presence of mapped Class II wetlands, the presence of Primary
19 Agricultural Soils on the site, and the presence of a Deer Wintering Area nearby.
20 Petitioner's work to address the potential "constraints" identified by the CCPRC are

1 detailed in the reports and prefiled testimony of Stephanie Wyman (primary agricultural
2 soils) and Adam Crary (wetlands, deer wintering area, R.T.E. plants).

3
4 **Need for Present and Future Demand for Service**
5 (30 V.S.A. § 248 (b)(2))
6

7 Q22. What need for present and future demand for service does this Project fulfill?

8 A22. GF Power is a relatively new PUC-regulated electric utility serving a single industrial
9 customer, GF. GF has substantial demand for electricity to power its semiconductor
10 manufacturing business. On an annual basis, GF uses more electricity than the entire
11 City of Burlington. As a result, GF Power has the third largest utility load among
12 Vermont distribution utilities.³

13 GF Power is subject to the requirements of the Renewable Energy Standard (“RES”),
14 including the so-called Tier II requirements under which a utility must obtain 10% of its
15 energy from “distributed renewable generation,” as defined in 30 V.S.A. § 8005, by
16 2032.⁴ This Project is one of several that GF Power has contracted with Encore to have
17 designed, permitted, and constructed for the purpose of complying with its RES Tier II
18 obligations.⁵

³ *Petition of GlobalFoundries U.S. 2 LLC requesting a certificate of public good, pursuant to 30 V.S.A. § 231, for a newly created, wholly owned subsidiary of GlobalFoundries, GF Power, to operate as a public service company, under regulation appropriate to its function, 21-1107-PET, Order of 10/21/22 (the “GlobalFoundries Order”). Pursuant to 3 V.S.A. § 810, the Commission may take judicial notice of findings in its prior orders.*

⁴ *Id.*

⁵ *Petition of Encore Renewable Energy for a declaratory ruling regarding whether several potential solar projects are separate plants and qualify as Tier II resources under Rule 4.400 and 30 V.S.A. § 8005, 23-3974-PET Order of 1/26/2022. For location, size, and interconnection information related to other planned projects, please see Exhibit WGKL-JC-5*

1
2 Q23. Is the Project required to meet the need for present and future demand for service which
3 could not otherwise be provided in a more cost-effective manner through energy
4 conservation programs and energy efficiency measures and load management?

5 A23. Yes. The project is being implemented specifically to comply with GF Power's RES Tier
6 II obligations. Vermont law requires these obligations to be met through "new renewable
7 energy" with a plant capacity of five MW or less and a direct connection to the
8 distribution or subtransmission system of a Vermont utility.⁶ The Project qualifies as
9 "new renewable energy" and thus satisfies GF Power's need for more Tier-II qualified
10 new renewable energy.

11 Moreover, with regard to GF Power's sole customer, semiconductor manufacturing is an
12 electric energy intensive industry and GF's Journey to Zero Carbon Emissions program is
13 multi-faceted focusing on improving energy efficiency, sourcing renewable and low-
14 carbon energy and enhancing manufacturing emissions controls. This Project allows GF
15 to make substantial progress by adding cost-effective new renewables in Vermont while
16 locating generation projects as close as possible to the load, thereby reducing power grid
17 impacts within Vermont.

18
19 **System Stability and Reliability**
20 (30 V.S.A. § 248(b)(3))
21

22 Q24. Will the Project adversely affect system stability and reliability?

⁶ 30 V.S.A. § 8005(a)(2).

1 A24. No. The Petitioner filed a complete application for interconnection pursuant to PUC Rule
2 5.500 on September 23, 2024. The Feasibility Study concluded that the project can move
3 forward without adverse impacts to system stability and reliability and without a system
4 impact study or a facilities study, provided that the following upgrades are installed
5 before operation of the project:
6

7 1) Construction of a riser pole from existing GMP vault, three-phase line extension using 1/0
8 covered wire, a primary metering package, and disconnect switch. The GMP facilities need to be
9 accessible by GMP trucks and the exact location of the take-off pole and line extension poles to
10 be determined by site visit with the Distribution Designer.
11

12 2) Installation of a Viper-S PCC recloser. The Project will be responsible for the recurring
13 monthly cost of the SCADA communications to the PCC recloser.
14

15 3) The following upgrades to the primary system are required:

16 The existing 328-amp 19G3 line regulators at taglets 57094, 57095 and 57097 must be
17 upgraded to 438-amp units.

18 Reconductoring of approximately 25 feet of three-phase overhead line, between taglets
19 57103 and 737369 from 1/0 AAAC to 477 ACSR Spacer Cable.
20

21 4) GMP requires that the inverters used for this project comply with the Inverter Source
22 Requirement Document of ISO New England (ISO-NE SRD). As part of the ISO-NE SRD

1 requirements, GMP requires the Project to enter “momentary cessation” for over voltage
2 conditions while operating in the “Permissive Operation” mode (Table III: Inverters Voltage
3 Ride-through Capability and Operational Requirements). GMP requires the inverters to enter
4 “Permissive Operation with Momentary Cessation” with a Maximum Response of 0.1s. If the
5 proposed inverters are not capable of this Maximum Response Time, a Category III inverter shall
6 be used instead which can comply with this requirement (IEEE 2018 6.4.2 Table 16). Inverter
7 responses to under voltages while operating in the Permissive Operation mode are specified in
8 the ISO-NE SRD at footnotes a and b.

9
10 5) GMP requires the Project’s inverters reconnect using a Soft-Start Ramp rate of 2% of
11 maximum current output per second with a modified reconnection time of six minutes.

12
13 6) The Project is required to execute a Project Notice to Proceed with the appropriate GMP
14 distribution designer when the Project is physically ready for interconnection to GMP’s system.

15
16 7) Approval of generation notification form with ISO-NE.

17
18 8) The Project must also wait for the upgrades identified in: QP 702 Williston F Mountain View
19 Solar LLC to be completed or opt to complete those upgrades as part of this Project.

20
21 Upgrades not resulting from the Project but are required before interconnection (GMP or other
22 project’s responsibility):

1 1) Reconductoring of primary overhead from taglet 34892 to taglet 57103 (approximately
2 2,600 feet) to 477ACSR covered wire.

3 2) Implementation of a live line reclose blocking scheme on the 19G3 circuit breakers.
4

5 The Petitioner will pay for the upgrades necessitated by the Project and will work with GMP to
6 ensure their completion prior to interconnection, and the Petitioner will enter into an
7 interconnection agreement with GMP prior to construction.
8

9 **Economic Benefit to the State and Its Residents**

10 (30 V.S.A. § 248(b)(4))
11

12 Q25. In what ways will the Project provide economic benefit to the State of Vermont and its
13 residents?

14 A25. The Project will pay annual local and municipal property taxes to the Town as required
15 under 32 V.S.A § 3481. Using the discounted cash flow methodology prescribed in 32
16 V.S.A § 3481(1)(D), along with guidance provided by the Department of Taxes, and current
17 property tax rates, WGKL Solar estimates that the local property taxes due from the Project
18 in the first year will be approximately \$6510.00 Over a 25-year period, WGKL Solar
19 estimates that the Project will result in approximately \$220,000.00 in local property taxes.
20

21 Q26. Will the Project provide direct economic revenue to the State?

22 A26. Yes. The Project will pay an annual Uniform Capacity Tax as required under 32 V.S.A §
23 8701. The revenue generated by this tax will go into the statewide education fund. With
24 the proposed AC capacity of the Project at 2,900 kW, and the current Uniform Capacity

1 Tax rate of \$4.00 per kW AC, the Project will pay approximately \$11,600.00 per year into
2 the statewide education fund. Over a 25-year term, WGKL Solar estimates that the Project
3 will pay approximately \$290,000.00 in Uniform Capacity Tax to the statewide education
4 fund.

5
6 Q27. Will the Project provide positive contributions to the State and its workforce?

7 A27. Yes. During the design and development phases, the Petitioner has hired many Vermont
8 and regional firms to work on the environmental, aesthetics, legal, engineering, and
9 permitting Project components. Additional electricians and workers will be needed
10 during Project construction, as well as during the ongoing maintenance and operation of
11 the Project. The Project's construction phase will also likely contribute to local economic
12 activity via lodging, meals, and other ancillary purchases made by contractors.

13
14 Q28. Does the Project result in any other economic benefits?

15
16 A28. Yes. GF continues to compete in an industry where the average selling price of products
17 is an important determinant in sales. One of the major factors affecting the selling price is
18 the cost of electricity. Therefore, managing electricity costs is a significant strategic focus
19 for GF to help it maintain its competitiveness and continue to operate in Vermont. This is
20 one of the core reasons GF petitioned the PUC to operate its own utility. Further, due to
21 the location of the Project on the GF campus and the ability to help serve on-site load, we
22 expect this to provide a benefit to the entire transmission grid because it will not require
23 significant upgrades and leaves transmission capacity and space for other projects in the
24 region.

1
2 In addition, GF customers are increasingly seeking products manufactured with new and
3 low-carbon energy. Renewable projects like the one proposed in this Petition deliver that
4 additional benefit. Also, as Vermont's largest private employer, providing strong
5 environmental sustainability practices has an advantage in acquiring and retaining
6 talented employees who then extend environmental initiatives beyond the workplace.

7
8
9 **Public Health and Safety**
10 (30 V.S.A. § 248(b)(5))

11 Q29. Will the Project have any adverse effects on the health, safety, or welfare of the public or
12 adjoining landowners?

13 A29. No. The Project will not adversely impact the public health and safety for the following
14 reasons: (1) all work will be performed in accordance with the National Electrical Safety
15 Code and the National Electric Code; (2) an existing perimeter fence around the site will
16 ensure security with appropriate electrical warning signs; (3) the Project will use anti-
17 reflective coating on panels to reduce the potential for glare; and (4) the Project will not
18 exceed acceptable sound thresholds at nearby residences.

19
20 **Air Pollution**
21 (30 V.S.A. § 248(b)(5))

22 Q30. Will this Project result in undue adverse effect on air quality?

23 A30. No, the Project will not involve any industrial/manufacturing emissions, excessive dust and
24 smoke during construction, dust or noise from blasting, odors or excessive noise from

1 construction activity. Moreover, the proposed Project will help reduce the need for carbon-
2 based sources of electric energy, contributing to improved air quality.

3
4 Q31. Please explain any potential acoustic impacts from the Project.

5 A31. Petitioner has hired consulting engineers Krebs & Lansing (K&L) to estimate sound
6 emissions from the electrical equipment anticipated to produce audible sounds, and to
7 model sound propagation to assess levels at the closest residences and property lines.
8 Please see K&L's acoustic analysis at Exhibit WGKL-JC-7. K&L concluded that the
9 Project's highest modeled sound pressure level at the closest residence is 37 dBA (exterior)
10 (daytime) with lower levels during the evening.

11
12 Q32. Will the sound produced by the proposed Project create an undue adverse effect?

13 A32. No, the sound levels calculated at the nearest residence will be below the maximum limits
14 of 45 dBA (exterior) as required by the Commission.

15
16
17 **Use of Natural Resources**
18 (30 V.S.A. § 248(b)(5))

19 Q33. Will the Project require use of natural resources?

20 A33. No. The Project will use passive solar energy to produce electricity that local consumers
21 may utilize to power their homes and businesses. The Project may use a minimal amount
22 of imported gravel to improve portions of the access road.

Greenhouse Gas Impacts
(30 V.S.A. § 248(b)(5))

Q34. Will Project construction or Project operation produce any undue air pollution or greenhouse gas impacts?

A34. No. Other than minor temporary emissions during construction, the Project will not emit greenhouse gases. In fact, this Project will enable Vermont to reduce its reliance on greenhouse gas-emitting generation. The Agency of Natural Resources (“ANR”) will require the Petitioner to agree to greenhouse gas reporting requirements and thus the Petitioner commits to these terms as set forth below:

a. The Petitioner shall provide ANR with the following Project “as-built” information within 60 days of the commissioning date of the Project to assist the Agency with compiling and analyzing greenhouse gas impacts:

- i. Solar panel manufacturer and model;
- ii. Solar panel cell technology (e.g. mono-Si, multi-Si, CdTe, etc.);
- iii. Rated solar panel output (in watts);
- iv. Number of solar panels installed;
- v. Array mounting type (fixed, 1-axis tracking, 2-axis tracking, ground, roof, other);
- vi. For fixed or 1-axis tracking, panel orientation and mounting angle;
- vii. Rack system manufacturer and model;
- viii. Rack system components, including the number of aluminum rails, steel mounting posts, etc.;
- ix. Number and type of any other mounting components (e.g. concrete ballasts and foundation blocks);
- x. Manufacturer, model and number of inverters;
- xi. Manufacturer, model and number of transformers;
- xii. Mass of concrete used (for ballasts, foundations, mounting pads, etc.);
- xiii. Percent of Portland cement composition of concrete;
- xiv. Description, quantity and source of any recycled materials used (e.g., recycled content concrete, recycled aluminum racking, etc.);
- xv. Amount (length) and gauge of wiring used for project;

- 1 xvi. Components for connection to grid (circuit boxes, circuit breaker panels,
2 metering equipment, etc.);
- 3 xvii. Distance (e.g., truck miles traveled) for transport of system components to
4 site; and
- 5 xviii. Distance to grid connection.
- 6

7 (b) By January 30 of each year, ANR may request that Petitioner provide an annual report
8 for the previous calendar year of operations. The annual report shall contain the
9 information set out below, which will be used to assist ANR with compiling and
10 analyzing greenhouse gas impacts. Petitioner will have 60 days from the date of ANR's
11 request to supply the information, excepting the Renewable Energy Credit information,
12 which may be submitted by July 31, of each year. Should ANR not request the
13 information set out below by January 30, Petitioner will not have any obligation to
14 provide an annual report from the previous year of operations. The information to be
15 provided includes the following:

- 16 i. Electric generation in kWh for the prior year, broken down by month and
17 the sale of any Renewable Energy Credits associated with generation; and
- 18 ii. Any information about the replacement of PV panels, inverters,
19 transformers, or a complete racking system. In instances of failure and
20 replacement of equipment (e.g. PV panels, inverters, etc.), Petitioner shall
21 provide descriptions of both the failed and replacement components at the
22 same level of detail as required by the "as-built" reporting requirements of
23 condition (a), above. This provision does not require Petitioner to provide
24 information about de minimis replacement of system components (e.g.,
25 replacement of racking system hardware), or information regarding regular
26 maintenance activities.
- 27

28 (c) Should ANR not request the information in (a), above, in any two consecutive years
29 after Project commissioning, Petitioner's reporting obligations for all subsequent years
30 shall automatically cease.

1 (d) ANR and Petitioner, by mutual agreement, may cancel or amend Petitioner's reporting
2 obligations set out at (a) at any time.

3 (e) ANR shall not use the information provided by Petitioner in (a) above to make any
4 claims or report of benefits (including, but not limited to, benefits related to the
5 renewable attributes of the Project's electric generation and greenhouse gas reductions
6 associated with the Project) accruing to Vermont, or any other entity, resulting from
7 the Project generating electricity from photovoltaic generation.

8
9 **Transportation Systems / Traffic**
10 (10 V.S.A. § 6086(a)(5))

11 Q35. Will the Project cause unreasonable congestion or unsafe conditions with respect to use of
12 the highways, waterways, railways, airports or airways, and other means of transportation
13 existing or proposed?

14 A35. No. The Petitioner proposes to deliver materials to the Project site using Mountain View
15 Road as well as the existing privately owned access road on the property owned by Global
16 Foundries. The Project is not expected to require oversize or overweight deliveries. The
17 Project will not require road closures or lane shutdowns for extended periods of time. No
18 other long-term interruptions or impacts to highways or local roads are anticipated.

19 **Educational Services**
20 (10 V.S.A. § 6086(a)(6))

21 Q36. What impact will the Project have on educational and services?

22 A36. The Project will not have any impact on educational services.

Municipal Services
(10 V.S.A. § 6086(a)(7))

Q37. Will the Project need municipal services, including any special police, fire, or rescue services, place an unreasonable burden on the ability of the local government to provide municipal or governmental services, or would training be required?

A37. No. The Project will not require any municipal water or sewer services, new roadway acceptance or maintenance by the Town nor require any fire or police services beyond those typically required of other businesses.

Q38. Will the first responders have access to the Project site in the event of an emergency?

A38. Yes, the Petitioner will provide first responders access to the Project site in the event of an emergency. A lockable disconnect switch will allow shutdown of the Project in case of fire or another emergency.

Historical and Archeological Sites
(30 V.S.A. § 248(b)(5) 10 V.S.A. § 6086(a)(8))

Q39. Will this Project have an undue adverse effect on below ground or above ground historic sites?

A39. No. No above ground historic sites will be adversely impacted by the Project. The Petitioner consulted with T.J. Boyle Associates who conducted a historic structures review for the Project using data from the Vermont Division for Historic Preservation's Online Resource Center for the Town of Williston. They found that the proposed array structures will not materially encroach on existing views of the four nearby properties of

1 historical significance, the Starr Apartments, the Vos House, the Paya House, and the
2 Brennan Farm. Of these, only the viewshed of the Paya House will have potential
3 visibility of the proposed arrays. All other properties will be screened from view by
4 intervening vegetation and landform. Though the memo concludes that the proposed
5 Project will not be out of context with existing conditions, Petitioner will maintain
6 existing vegetation to a height range between 15-25', as depicted on the site plan Exh.
7 WGKL-JC-2, between the Paya House and the Project to provide screening of the array.
8 For additional analysis and information please see Exh. WGKL-JC-5.

9
10 The Petitioner consulted with VT Division of Historic Preservation who advised that the
11 Petitioner conclude a Phase 1 archeological survey for the Project. Pursuant to this
12 advisement, the Petitioner has engaged with the UVM Consulting Archeology Program to
13 perform a Phase I Site Identification Survey of the site, which UVM will be completed in
14 October or November of 2025, depending on the weather and UVM CAP's schedule. If
15 the work cannot be completed before the ground freezes in 2025, the work will commence
16 in the spring when conditions allow. The Petitioner will convey the survey results to the
17 Division of Historic Protection. The Petitioner supports the following conditions to be
18 included within the CPG:

- 19 • Prior to the completion of all relevant archaeological investigations, the Petitioner,
20 in consultation with the Vermont Division for Historic Preservation (VDHP), shall
21 identify the Project area as a not-to-be-disturbed archaeological buffer zone.
- 22 • Topsoil removal, grading, scraping, cutting, filling, stockpiling, logging or any other

1 type of ground disturbance is prohibited within the archaeological buffer zone prior
2 to conducting all appropriate archeological studies.

- 3 • Archaeological studies to identify or evaluate sites will be carried out by a qualified
4 consulting archaeologist focused within the areas proposed for installation of the
5 underground electrical connections within the overall array. The archaeological
6 studies will be scheduled accordingly so that mitigation measures that may be
7 necessary can be satisfactorily planned and accomplished prior to construction.
- 8 • All archaeological studies and assessments must be conducted by a qualified
9 consulting archaeologist and must follow the VDHP Guidelines for Conducting
10 Archaeological Studies in Vermont. The Petitioner's archaeological consultant
11 must submit any scope of work to the VDHP for review and approval before
12 commencing the work.
- 13 • Archaeological sites within the Project area will not be impacted until any necessary
14 mitigation measures have been completed. Mitigation may include but is not limited
15 to further site evaluation, data recovery, redesign of one or more proposed project
16 components, or modification of the buffer zone boundaries or the specific conditions
17 that refer to the same.
- 18 • Proposed mitigation measures will be discussed with and approved by the VDHP
19 prior to implementation, and a copy of all mitigation proposals will be filed with
20 the PUC. The archaeological studies will result in one or more reports, as
21 appropriate, that meet the VDHP Guidelines for Conducting Archeological Studies
22 in Vermont. A digital copy of the final report will be submitted to the VDHP.

Development Affecting Public Investments
(10 V.S.A. § 6086(a)(9)(K))

Q40. Will the Project unnecessarily or unreasonably endanger any public or quasi-public investment in nearby facilities, services, or lands, or materially jeopardize or interfere with the function, efficiency, or safety of, or the public's use or enjoyment of or access to nearby facilities, service or lands?

A40. No. The nearby existing public investment is Mountain View Road, and the Project will not interfere with the public's use of it.

Compliance with Integrated Resource Plan
(30 V.S.A. § 248(b)(6))

Q41. Is the Project consistent with GF Power's least cost Integrated Resource Plan (IRP)?

A41. It is Petitioner's understanding that GF Power has not completed an IRP and is not required to submit its first such plan to the PUC until July 1, 2026. Based on Petitioner's understanding of the needs of GF Power's sole customer and the utility's planning to meet those needs through contracting for substantial amounts of renewable energy via competitively priced PPAs and on customer-owned sites close to customer load, thereby avoiding substantial costs and environmental impacts related to transmission, it is anticipated that this Project will be consistent with GF Power's forthcoming IRP.

Compliance with Vermont Electric Energy Plan
(30 V.S.A. § 248(b)(7))

Q42. Is the Project consistent with the 2022 Comprehensive Energy Plan (CEP)?

A42. Yes. The Project will contribute to meeting the state’s long-term renewable energy goals because it is a proposed solar project that is located near load. Specifically, the Project furthers the key objectives in the CEP, which calls for meeting Vermont’s long-term energy needs largely with renewable resources as embodied in the high-level goals set in the 2011 and 2016 CEPs, and reaffirmed in the 2022 CEP (page 2): “Meet 25% of energy needs from renewable sources by 2025, 45% by 2035, and 90% by 2050.” The Project is consistent with CEP thematic goals including affordability, in- state generation, diversity of supply, grid resiliency, and low emissions. Moreover, as the Project is being built close to load on GlobalFoundries’ facilities, it furthers the CEP’s “goal of a secure and affordable electric grid that can efficiently integrate, use, and optimize high penetrations of distributed energy resources to enhance the state’s resilience and reduce greenhouse gas emissions.” CEP 2022, page 13.

Impact on Vermont Utilities and Customers
(30 V.S.A. § 248(b)(10))

Q43. Can existing or planned transmission facilities serve the Project without creating an undue adverse effect on Vermont utilities, customers, or existing transmission facilities?

1 A43. Yes. The existing transmission infrastructure has already been mitigated against potential
2 Transmission Ground Fault Over-Voltage and the Project is not sited within the
3 Sheffield-Highgate Export Interface.

4
5
6 **Setbacks**
7 (30 V.S.A. § 248(s))
8

9 Q44. Does the Project comply with minimum setbacks established under 30 V.S.A. § 248(S)?

10 A44. Yes. The Project will be set back more than 100 feet from Mountain View Road to the
11 south, and more than 50 feet from other property boundary lines. Please refer to Exhibit
12 WGKL-JC-2 for the detailed site plan.

13
14 **PUC Rule 5.900 Decommissioning Plan and Fund**

15 Q45. Will the Project be decommissioned at the end of its useful life, with various system
16 components disposed of?

17 A45. Yes. At the end of the Project's useful life, the Petitioner will assess whether: (1) it is
18 financially viable to continue to operate the Project as is; or (2) any changes could be made
19 to the Project to allow its continued operation, and appropriate amendment to its CPG be
20 sought; or (3) the Project should be decommissioned. In any event, the Petitioner will
21 remove the Project once it is no longer in service and restore the site to its condition prior
22 to installation of the Project to the greatest extent practicable as required under PUC Rule
23 5.904(B). The Petitioner has developed a Decommissioning Plan that would apply when

1 the Petitioner decommissions the Project. Please see Exhibit WGKL-JC-8 for the Project's
2 decommissioning plan.

3
4 Q46. Has the Petitioner proposed a decommissioning fund?

5 A46. Yes, the Petitioner has proposed a funding mechanism based upon an estimate of the
6 Project's decommissioning costs that does not account for equipment salvage. As required
7 by PUC Rule 5.904(B), the decommissioning cost estimate is in present-day dollars and
8 addresses the elements in that rule. The Petitioner commissioned Krebbs and Lansing to
9 generate a decommissioning plan and cost. This plan has been prepared by a professional
10 engineer. The decommissioning fund will be in place at the time construction begins and
11 will be funded by a decommissioning surety bond without an expiration date. Please see
12 Exhibit WGKL-JC-8 for details on the proposed decommissioning fund with supporting
13 documents and a draft surety bond and surety bond demand notice. Prior to commencing
14 Project construction, the Petitioner shall file and receive Commission approval of an
15 executed surety bond.

16
17
18 Q47. Does this conclude your testimony at this time?

19 A47. Yes

20

EXHIBIT LIST

Exhibit WGKL-JC-1	Resume
Exhibit WGKL-JC-2	Site Plan, USGS Map, Aerial Photograph
Exhibit WGKL-JC-3	Equipment Specifications
Exhibit WGKL-JC-4	45 Day Notice Comments Received in Response
Exhibit WGKL-JC-5	Historic Structures Memo
Exhibit WGKL-JC-6	Feasibility Study and One Line Diagram
Exhibit WGKL-JC-7	Acoustic Analysis
Exhibit WGKL-JC-8	Decommissioning Plan and Fund

WITNESS DECLARATION

I, Jake Clark, being over 18 years of age, and competent to testify on these matters declare that on behalf of Petitioner, I prepared my prefiled testimony and exhibits in the above captioned matter and I have the necessary expertise to testify to the same information. I declare that my testimony and exhibits are true and accurate to the best of my knowledge and belief. I understand that if such responses are false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Burlington, Vermont, this 30th day of, September 2025.

____/s/ Jake Clark_____

Jake Clark