

November 7, 2025

Via First-Class Mail and Email

Addressees (see Service List)

**RE: Novus 242 Solar LLC's Proposed 3.7 MW Solar Project in Jay, Vermont
45-Day Notice of Petition to be filed with the Vermont Public Utility Commission**

Dear Persons and Entities Entitled to Notice,

Pursuant to 30 V.S.A. § 248 and Public Utility Commission Rule 5.402, Novus 242 Solar LLC (“N2S”) hereby submits the following pre-petition notice concerning its proposed 3.7 MW solar project (“the Project”) to be located on a former gravel pit off Vermont Route 242 in Jay, Vermont. N2S is owned by Novus Energy Development, LLC, which has developed a number of projects in Vermont. The Project is proposed in the same location as a previously-approved 500 kW net-metered solar project,¹ which has not yet been constructed. If approved, the Project would replace the net-metered project.

I. Introduction

N2S is preparing to file an application for a Certificate of Public Good (“CPG”) with the Vermont Public Utility Commission (“PUC”), requesting approval to install and operate a 3.7 MW solar electric generation facility (the “Project”) on the gravel pit site off Route 242. The electricity from the Project will be delivered to the Vermont Electric Cooperative (“VEC”).

Earlier this year, N2S was granted a CPG to construct a smaller 500kW net-metered solar electric generation facility on the Project site (the “Net-Metering Project”). Since then, N2S has engaged in discussions with VEC to build a larger Project that utilizes more of the previously disturbed gravel pit for solar energy and N2S now proposes to instead build this larger Project at this site if approved. N2S will move forward with constructing the previously permitted Net-Metering Project if it is unable to obtain a CPG for this proposed Project.

The remainder of this letter briefly describes: (1) the Project, including plans for construction; (2) the expected benefits of the Project; (3) the preliminary assessment of potential impacts; (4) the expected date a petition will be filed with the PUC; and (5) the rights of entities receiving this notice to comment on the Project in accordance with PUC Rule 5.402.

¹ See Case No. 24-3725-NM (Final Order and CPG issued April 17, 2025).

II. Project Description and Construction Plans

The Project will be located on previously disturbed soils on the site of a former gravel extraction operation off of Vermont Route 242 in Jay, Vermont. The 3,700-kW (alternating current, or “AC”) solar electric generation facility will occupy 13.26 (±) acres of an approximately 66-acre parcel of land owned by MM LLC. The parcel does not currently have an emergency 911 address. The Project will be accessed via the existing access drive for the gravel extraction operation, which will be widened, improved, and extended into the middle of the Project site. *See Location Map/Site Plan – Attachment A.*

The Project will consist of solar modules mounted on metal racks, string inverters, two pad-mounted transformers, electrical collector system components consisting of underground conduit, wire, AC combiner panel, and AC disconnects. The Project will be surrounded by a minimum 7-foot high fence. Approximately six new poles, a short underground power line, and a short overhead power line are proposed between the Project and the existing utility pole located on Vermont Route 242 where the Project will interconnect to the VEC system.

A preliminary Site Plan is included in *Attachment A*. It illustrates the anticipated location of the Project’s components in relation to the surrounding area. N2S chose the proposed location for this solar array based upon its solar exposure, accessibility to existing roads and three phase power lines, previously disturbed soil, and its minimal impacts on natural resources and the character and aesthetics of the surrounding area.

While the attached site plan represents the current preferred layout, the layout that will be contained in the final application may vary somewhat based upon further engineering, environmental, or other siting considerations. The final layout will be within the overall site area where environmental and other impacts have been evaluated for the purposes of this 45-day notice. The basic parameters of the site plan include the following working assumptions:

- Construction will be performed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control February 2020.
- Year-round daily access to the array is not required. Therefore, no on-site septic or water supply systems will be constructed. The solar project’s energy production will be monitored remotely and, if any abnormal conditions are detected, technicians will be dispatched as required.
- The solar array for the Project will be enclosed by a perimeter fence that will meet applicable electric safety code standards.

III. Site Access & Equipment Delivery

Standardized trucking methods will be used to transport the panels and other project components to the site. Typical tractor-trailer and box truck vehicles will be used to transport materials to the site for construction. The Project will not require any oversized loads. The access drive will be used for bringing in all construction-related equipment and machinery. Construction equipment will likely include a light duty crane or similar equipment to lift the transformer in place, trucks to move racking around the site, and a small trencher to install underground electrical wiring.

IV. Project Benefits

The Project will provide economic benefits including: (i) payment of State educational and municipal property taxes; (ii) purchasing project equipment from Vermont businesses, when commercially feasible; and (iii) employing Vermont businesses for pre-application, construction, and operation and maintenance work, when commercially feasible.

In addition to these economic benefits, the proposed solar electric facility will also result in important environmental benefits. The 2020 Vermont Comprehensive Energy Plan set a goal for the State to receive 90% of its energy from renewable resources by the year 2050, and solar power is needed to meet that goal. The solar energy produced by this Project will result in less electricity needed in the New England region from plants that likely use fossil fuel. It will emit no air pollutants (including CO₂) in generating electricity, and thus will help in a small but measurable way to reduce global warming, acid rain, and the negative public health effects associated with the use of fossil fuel.

V. Preliminary Impact Assessment

Based upon the initial review performed by N2S and its consultants, including review of the State's environmental databases, the siting of the Project will either entirely avoid, or not cause undue adverse impacts to, environmental resources and will not create any public health or safety concerns. Key elements of our assessment include the following:

- The Project will largely utilize a previously disturbed gravel extraction pit that will be reclaimed prior to construction of the Project. The Project has been designed to avoid impacts to Class II wetlands and buffers and any streams and other sensitive natural resources whenever possible. Where impacts will occur, they will be minimized and permit(s) obtained, if needed.
- The use of a previously disturbed extraction site avoids the need for substantial vegetative clearing.
- No significant natural communities or necessary wildlife habitat are known to exist within the Project footprint.
- The Project will be designed to meet electric safety and utility interconnection standards for safe and reliable operation of solar electric facilities.
- The Project will require no new municipal services and will not pose undue burdens on town fire, police, or water/sewer services. The Project will not impact the ability of the town to provide educational services.
- N2S's aesthetic consultant, Bowman, Ltd., a civil engineering, landscape architecture, and planning firm, has performed a preliminary visual analysis of the proposed Project. Their analysis found that the Project site is largely screened from surrounding areas by vegetation and/or landform that surrounds the site, topography of the area, and existing mature trees and shrubs will remain around the proposed array. The proposed array will be mostly screened from publicly accessible areas by a mature existing deciduous and evergreen buffer that borders much of the Project. Even during leaf-off conditions and with a limited amount of proposed vegetative clearing along the edges of the site, the surrounding existing vegetation will provide substantial screening of the proposed array. There will be potential visibility of the proposed array from limited residential properties during leaf off conditions that currently have a view of the gravel pit. Based on these considerations, the Project will not result in undue adverse impacts to the aesthetic and scenic and natural beauty of the area and no preliminary visual mitigation is proposed. Bowman will complete a full aesthetic impact review for inclusion with the petition for a CPG. Any impacts will be evaluated under the so-called Quechee Analysis and the need for potential mitigation will be further assessed based on this analysis.

VI. Expected Petition Filing Date with Vermont Public Utility Commission

N2S intends to file a Section 248 petition with the PUC soon after the 45-day notice period expires, which would be no sooner than December 22, 2025.

VII. Comments to the Public Utility Commission & Additional Information about Section 248 Proceedings

Under 30 V.S.A. § 248(f)(1), the municipal and regional planning commissions may make recommendations to N2S within 40 days of this notice and may convene a public hearing on the proposed Project. In addition, after N2S files its section 248 petition with the PUC, the planning commissions may make further recommendations to the PUC, to which the PUC will give due consideration. Recommendations made to the PUC pursuant to § 248(f)(1), or the lack of such recommendations, shall not preclude municipal and regional planning commissions and municipal legislative bodies from exercising their rights to appear as parties pursuant to § 248(a)(4)(G)-(I). In its Section 248 Petition, N2S will address any written comments provided to it in response to this letter and related to the Section 248(b) criteria and any oral comments related to those criteria made at any public hearing convened by the planning commissions.

For additional information regarding this process, including participation in the PUC proceeding, please refer to the PUC's "Public Participation and Intervention in Proceedings Before the Vermont Public Utility Commission" document, available on the website at <https://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission>. Information regarding the PUC's procedures for Section 248 proceedings can also be found on the PUC's website at <https://puc.vermont.gov/document/section-248-procedures>.

We here at N2S hope that you will support this Project given the benefits it will provide to the town and the State, and given its extremely limited impacts. In the meantime, I invite you to contact me with any questions or comments you have at the contact information below, as we welcome your input and suggestions to make this a successful project.

Sincerely,



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Enclosures:

Attachment A – Location Map and Site Plan

Attachment B – Certificate of Service

Attachment C – Statement of Compliance with Advance Notice Requirements