

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-2412-PET

Petition of GRH Growth, LLC, pursuant to 30 V.S.A § 248, authorizing the construction and operation of a 3.5 MW solar array in Vernon, Vermont	
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Order entered: 12/31/2025

SECOND INFORMATION REQUEST

This case concerns a petition filed with the Vermont Public Utility Commission (“Commission”) by GRH Growth, LLC (“Petitioner”), pursuant to 30 V.S.A § 248, requesting a certificate of public good authorizing the construction and operation of a 3.5 MW solar array in Vernon, Vermont (the proposed “Facility”). In this order, I request additional information about the Facility’s plans to participate in Vermont’s renewable energy standard (“RES”). Responses to the following information requests are due by February 2, 2026.

1. Please state which categories (*e.g.*, total renewable energy, distributed renewable generation, new renewable energy, etc.) of the RES the Facility will qualify for.
2. If the Petitioner believes that the Facility qualifies as a distributed renewable generation facility under 30 V.S.A. § 8005(a)(2), please explain whether the Facility will be either “directly connected to the subtransmission or distribution system of a Vermont retail electricity provider” or “directly connected to the transmission system of an electric company required to submit a Transmission System Plan under subsection 218c(d) of [Title 30].”
3. If the Petitioner asserts that the Facility will be directly connected to the transmission system of an electric company required to submit a Transmission System Plan under subsection 218c(d) of Title 30, please state whether the Facility is part of a Transmission System Plan approved by the Commission to avoid or defer a transmission system improvement needed to address a transmission system reliability deficiency identified and analyzed in that Plan.

4. If the Petitioner believes that the Facility qualifies as a distributed renewable generation facility under 30 V.S.A. § 8005(a)(2), the Commission will need to determine whether the Facility and the existing Vernon hydroelectric station are part of the same “plant” as that term is defined in 30 V.S.A. § 8002(18).
 - a. Please address the factors the Commission considers in its single-plant analysis: common ownership (*e.g.*, project developers, ownership of completed projects, identity of lessees, project site landowners), contiguity in time of construction (*e.g.*, planning, presentations made to various groups, timing of natural resource assessments, timing of interconnection applications), proximity of facilities (*e.g.*, distance between facilities, intervening buffers, topography, and type of installations), and common equipment and infrastructure (*e.g.*, roads, access roads/paths, control facilities, connections to the electric grid, shared new or upgraded utility infrastructure).¹
 - b. In addressing whether the two facilities are part of the same project for purposes of Section 8002(18), please address what weight the Commission should give to the coordinated interconnection and operation of the two facilities that is described in the Petitioner’s December 17, 2025, discovery responses to the Vermont Department of Public Service and the prefiled testimony of Patrick Retelle.
 - c. Please specifically address whether the real-time automation controller constitutes shared infrastructure or equipment for purposes of Section 8002(18).
 - d. On page 6 of his prefiled testimony, Patrick Retelle states that “[t]he Vernon Solar project will seek interconnection at ISO-NE through the “Surplus Interconnection Service” that allows an interconnection customer of ISO-NE to use surplus capacity at a pre-existing point of interconnection.” Please state whether the

¹ The Commission has recommended revisions to the statutory definition of the term “plant” pursuant to Act 38 of 2025. *PUC Investigation re definition of single plant pursuant to Act 38 of 2025 and decommissioning financial assurances* Case No. 25-1253-INV, Recommendation Issued 11/04/25. Responses to this information request should analyze this issue using current law. The Petitioner may also address how the Commission would treat the two facilities should the statute be amended as proposed by the Commission.

Facility and the Vernon hydroelectric station will share a common point of interconnection.

SO ORDERED.

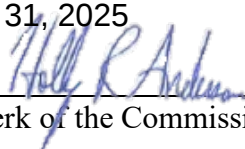
Dated at Montpelier, Vermont, this 31st day of December, 2025.



Jake Marren, Esq.
Hearing Officer

OFFICE OF THE CLERK

Filed: December 31, 2025

Attest: 
Clerk of the Commission

PUC Case No. 25-2412-PET - SERVICE LIST

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