

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Novus 242 Solar LLC for a Certificate of)
Public Good, pursuant to 30 V.S.A. § 248, authorizing)
the installation and operation for a 3.75 MW ground-) Case No. 26-____-PET
mounted solar array in Jay, Vermont to be known as)
the “Novus 242 Solar Project”)

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

By this Petition Novus 242 Solar LLC (“N2S” 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 3.75 MW solar electric generation facility in Jay, Vermont. In support of this Petition, N2S represents:

1. N2S is a Vermont limited liability company with a business address of 250 Main Street, Montpelier, Vermont, 05602.
2. N2S proposes to install and operate the Project on approximately 12.87 (±) acres of an approximately 66-acre parcel of land off Route 242 in Jay, Vermont (the “Property”). The Property has been previously disturbed through its use as a gravel and sand extraction site, and the Project will be located on remediated portions of the extraction operation.
3. Petitioner is proposing this Project as a potential replacement for a 500 kW net metering facility that was proposed on the same site and was issued a Certificate of Public Good by the Commission in Case No. 24-3725-NM (the “NM Project”). Following approval of the NM Project and discussions with the landowner and Vermont Electric Cooperative. (“VEC”), Petitioner decided to pursue development of a larger project to more fully use this disturbed site and provide more renewable energy to VEC to help fulfill VEC’s obligations under the Renewable Energy Standards. The area on the site where the NM Project was proposed, which

would become part of the proposed Project, is indicated on the Site Plan in *Exhibit N2S-AB-2*. If this 3.75 MW Project is approved, the Commission could rescind the CPG for the 500 kW NM Project at the same time as approval of this Project. Alternatively, if for some reason this Project is not approved, Petitioner would still pursue construction and operation of the approved 500 kW NM Project under the CPG issued in 24-3725-NM.

4. The Project consists of approximately 3,700 (\pm) 545-watt solar panels installed on single axis trackers within a perimeter fence. The Petitioner proposes to install a fixed knot game-style fence that will be a minimum of 7' high around the perimeter of the array.

5. 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 2,000 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 six new utility poles. The electricity will travel overhead along the poles to an existing pole on Route 242 where the Project will interconnect to the Vermont Electric Cooperative ("VEC") system.

6. The Petitioner will access the Property from an existing access driveway off Route 242 used for the gravel and sand pit operation. The Petitioner will extend the access drive into the middle of the Project site.

7. N2S submitted pre-filing notice to the required parties at least 45 days prior to filing this petition in compliance with Commission Rule 5.402.

8. N2S will provide notice of the proposed Project under Rule 5.407 to adjoining landowners upon receipt of notice of a complete petition.

9. In support of this Petition, N2S submits supporting prefiled testimony and exhibits that address each of the § 248(b) criteria by the following witnesses: Alex Bravakis, Seth Goddard, Dori Barton, and Lucy Thayer. An index of evidence identifying the evidence pertaining to each criteria is provided with this Petition pursuant to Rule 5.403(A)(16).

10. 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.

11. The System Impact Study for the Project is currently underway with VEC. A completed interconnection study does not appear to be an express requirement for the Petition materials under Rule 5.403. Rule 5.403(A)(14) refers only to the inclusion of “information to document compliance with Commission Rule 5.500 regarding interconnection procedures for electric generation facilities.” This Petition meets that requirement. In accordance with Rule 5.500, Petitioner filed an interconnection application on November 11, 2025 and interconnection studies for the Project have commenced, including completion of a preliminary screening. See Testimony and exhibits of Alex Bravakis.

12. However, if the Commission takes the position that a completed interconnection study is required under Rule 5.403(A), the Commission has the authority under Rule 5.415 to waive any requirements of Rule 5.400. Petitioner submits that there is good cause to do so for this Project due to the unique circumstances stemming from the end of the federal Investment Tax Credit (“ITC”), which is outside of the Petitioner’s control and which significantly impacts the potential viability of this Project. Qualification for the ITC materially impacts the cost of Project

development, and is assumed in the price of the Power Purchase Agreement (“PPA”) that Petitioner and VEC have executed. Qualification for the ITC thus allows Petitioner to sell the Project output at a lower price to VEC because the Project costs are in turn lower.

13. Due to the changes to the ITC under the 2025 “One Big Beautiful Bill,” the Project may only qualify for these credits if it commences construction of the Project by July 2026 or is fully operational by the end of 2027. In order to have the best chance to secure these credits under the current IRS rules, Petitioner is respectfully seeking expedited review of this Project by the parties and Commission and is thus asking the Commission to commence this proceeding as quickly as possible. To the extent that the Commission views a completed SIS to be a requirement to deem this Petition complete, Petitioner requests that the Commission find good cause to waive this requirement pursuant to its authority under Rule 5.415 and commence the proceeding as soon as possible, including scheduling a conference to establish a schedule for the proceeding.

14. For the reasons set forth above related to qualification for the ITC, Petitioner seeks a decision from the Commission by June 2026. While Petitioner understands this will require an expedited proceeding schedule, it is in the best interests of VEC customers and the State of Vermont for this Project to move forward and secure a cost-effective resource for VEC before the ending of the federal tax credits. Additionally, Petitioner does not anticipate any substantial concerns with this Project as the Project site and a smaller version of this Project has already been reviewed in the prior NM Project proceeding.

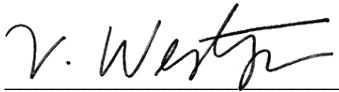
Request for Relief

WHEREFORE, N2S respectfully requests the Commission to:

1. Waive any requirement for a completed interconnection study for good cause pursuant to the Commission's authority under Rule 5.415 in order to deem this Petition complete as soon as possible;
2. Hold a prehearing conference as expeditiously as possible on the Petition;
3. Set an expeditious schedule for the proceeding;
4. Hold evidentiary hearings, as the Commission determines necessary;
5. Make findings as required by 30 V.S.A. § 248 and *Section 8007(b) Order*, that N2S shall be authorized to construct and operate a 3.75 MW solar electric generation facility off Route 242 in Jay, Vermont and that the Project will promote the general good of the State of Vermont; authorize N2S to undertake the actions described herein and in the attached testimony and exhibits; and issue a Certificate of Public Good to that effect by June 2026;
6. Upon issuance of a Certificate of Public Good for the Project in this proceeding, rescind the Certificate of Public Good granted to Petitioner in Case No. 24-3725-NM; and
7. Take such other actions as may be required for the expeditious review and approval of this Petition.

DATED at Burlington, Vermont, this 6th day of February, 2026.

Novus 242 Solar LLC

By: 
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