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-mounted solar array in Jay, Vermont to be known as the "Novus 242 Solar Project"	)	Case No. 26-____-PET

PREFILED TESTIMONY OF T. ALEX BRAVAKIS

February 6, 2026

Summary: Mr. Bravakis provides an overview of the proposed Novus 242 Solar Project , including the Project's compliance with the following Section 248 Criteria: need for the project; system stability and reliability; economic benefits, public health and safety; use of natural resources; greenhouse gas impacts; transportation systems; municipal services; educational services; historic sites; development affecting public investments; integrated resource plan; compliance with electrical energy plan; existing or planned transmission facilities; setbacks; and decommissioning plan and fund (Public Utility Commission Rule 5.900).

EXHIBIT LIST

N2S-AB-1: Resume of Alex Bravakis
N2S-AB-2: Site Plan and Cross-Sections
***NS2-AB-3*:** Representative Equipment Specifications
NS2-AB-4: One Line Diagram
NS2-AB-5: Decommissioning Plan
***N2S-AB-6*:** VEC Letter to Interested Parties
***N2S-AB-7*:** VEC Preliminary Interconnection Screening

Q1. Please state your name, occupation, and business address.

A1. My name is T. Alex Bravakis and I am the managing member of Novus Energy Development, LLC ("NED"), a firm specializing in the development of solar projects in Vermont and the sole member of Novus 242 Solar LLC ("Petitioner" or "Novus 242"). Our business is located at 250 Main Street in Montpelier, Vermont. I am assisting Novus 242 with development of this project.

Q2. What is the purpose of your testimony?

A2. My testimony supports the application of Novus 242 Solar LLC ("Novus 242 Solar" or "Petitioner") for a Certificate of Public Good to construct and operate a 3.75 MW AC solar electric generation project ("Project") located off Vermont Route 242 in Jay, Vermont. Specifically, my testimony provides an overview of the Project and describes the Project's compliance with certain Section 248(b) criteria as required under Commission Rule 5.400.

Q3. Please describe your professional background, qualifications, and experience.

A3. For over a decade, I have been involved with the development of renewable energy and combined heat and power projects, primarily in New England and California. As a member of project teams, I have been mainly responsible for project identification and coordination of all activities related to obtaining the contracts, permits, and agreements needed for project financing. As a managing member of NED, I coordinate all of the

major project development activities of our "pipeline" projects as well as identify and analyze new opportunities. I also have an understanding of current renewable energy policies and work to keep the team informed about existing and proposed changes to legislation that may impact the projects that we have under development. This experience has given me practical knowledge with respect to how projects transition from concept through construction. My resume is attached as ***Exhibit N2S-AB-1***.

Q4. Have you previously testified before the Public Utility Commission?

A4. Yes, I have provided prefiled testimony on behalf of a number of solar facility projects developed by NED.

Project Description & Overview

Q5. Please provide an overview of the Project.

A5. The Project is a 3.75 MW AC solar electric generation facility to be located on a portion of leased land on the parcel owned by MM LLC off of Route 242 in Jay, Vermont (the "Site"). The Site was previously used as a gravel and sand pit, and the fenced-in Project area will utilize the previously disturbed portions of the Site. Novus 242 previously proposed a 500 kW net-metering solar facility on this same Site, which received a Certificate of Public Good ("CPG") from the Commission in Case No. 24-3725-NM on April 17, 2025 (the "NM Project"). Novus 242 is proposing to build and operate this 3.75 MW Project on the Site in lieu of the NM Project.

The Project is located approximately 525-ft from Vermont Route 242, the closest traveled way, and about 292-ft to the nearest residence off of Mountain View Drive. The Project will occupy a fenced-in area of approximately 12.87 acres. Approximately 1.89 acres of vegetative management will be required for the Project and approximately 0.19 acres of vegetative clearing. The Project will be accessed through an existing driveway into the gravel pit area that will be extended by approximately 12,777 square feet to lead into the Project Site. See Site Plan (***Exhibit N2S-AB-2***).

The parcels surrounding the Project site contain dispersed residential dwellings and forest. The neighboring residences are accessible off of Mountain View Drive and Route 242. The Project Site contains vegetation on all sides and is lower in elevation than Route 242 and the closest residence. This difference in topography and intervening vegetation around the site will serve to filter, obscure and block the Project from offsite view locations, public vantage points, and nearby residences. See ***Exhibit N2S-AB-2***.

Q6. Please describe the design and equipment for the Project.

A6. The Project will be comprised of approximately 54 rows of solar panels running north to south. The panels will be mounted on single-axis trackers, which will reach a maximum height of approximately 11 feet at the highest point. See ***Exhibit N2S-AB-2***. On-site electrical equipment will include 15 inverters, rated at 250 kW each located on inverter racks, and alternating current ("AC") collector system components consisting of underground conduit, wire, AC combiner panel boards, AC switchgear, and AC power zone for service to the PV system auxiliary equipment. Two pad-mounted 2,000 kVA

transformers with secondary containment systems will be located next to the inverter racks at the center of the Project.

Power will run underground along the access road extension from the transformers to the end of the existing access drive, where the power will transition to overhead lines. The power will then run above-ground on approximately six new utility power poles to the point of interconnection at an existing Vermont Electric Cooperative ("VEC") power pole on Route 242. See ***Exhibit N2S-AB-2*.**

The entire solar field will be surrounded by a perimeter fence consisting of a fixed-knot, wire-style fence at least 7' high with openings of no smaller than 6" x 6". The fencing will be secured (meeting National Electric Code requirements) to prevent unauthorized access to the electrical equipment and will be kept close to ground level to avoid access by large wildlife. See ***Exhibit N2S-AB-2***. Specification sheets and cut sheets of representative solar panels and inverters are attached to my testimony as ***Exhibit N2S-AB-3*** and a one-line diagram of the proposed system design is included in ***Exhibit N2S-AB-4***. The final selection of specific equipment and manufacturers will be made after the CPG is obtained, depending upon market availability and engineering, procurement, and construction contractor specifications. Novus 242 expects that the final equipment will be materially the same as what is described in this Petition in terms of overall output and performance.

Q7. You mentioned that a net-metering facility was previously proposed by Novus 242 on this Site and approved by the Commission. How would approval of this Project impact the CPG for that net-metering facility?

A7. Novus 242 is proposing this Project as a potential replacement for the NM Project previously approved in Case No. 24-3725-NM. Following approval of the NM Project and discussions with the landowner and VEC, Novus 242 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, Novus 242 would still pursue construction and operation of the approved 500 kW NM Project.

Q8. Will the Project conform to applicable electrical, safety, power quality, and interconnection requirements established by the National Electrical Code, the Institute of Electrical and Electronic Engineers, and Underwriters Laboratories?

A8. Yes. The system will be designed to meet the applicable requirements set forth in the National Electrical Safety Code, National Electrical Code, the Institute of Electrical and Electronic Engineers, and Underwriters Laboratories as they relate to electrical compliance and safety, power quality, and interconnection.

Q9. Will the Project enter into an interconnection agreement with VEC for the facility?

A9. Yes. Novus 242 will enter into an interconnection agreement with VEC prior to operation of the Project.

Q10. Please state the Project's capacity and anticipated energy production.

A10. The nameplate capacity of the Project will be 3.75 MW (AC), with an installed DC wattage of 4.248 MW (DC). The Project is expected to produce a net energy output (after DC to AC conversion) of approximately 5,972 MWh per year.

Q11. How will the site be accessed during construction and operation of the Project?

A11. There is an existing drive off Route 242 that leads into the gravel pit area. This road will be extended into the Project area, and any traffic accessing the Project for construction or operation of the Project will utilize this entrance.

Q12. Please discuss the anticipated Project construction activities and schedule.

A12. Construction of the Project is expected to take several months following receipt of the necessary approvals depending on weather and other logistical constraints. The first phase of construction will be to conduct site preparation work as needed. The second phase of construction will involve the installation of the steel racking, frames, solar panels, and inverters. During this phase, VEC will install the overhead power lines, new poles, and pad-mounted transformer. The final phase of construction will involve

securing the solar modules, wiring the inverters, installing the data acquisition system, installing the perimeter fence, and constructing the permanent gravel turnaround. Following completion of these activities, the system will be tested and commissioned for continuous operation. All installation activities and related deliveries will occur between 7:00 AM and 7:00 PM Monday through Friday, and on Saturdays between 8:00 AM and 5:00 PM if required to meet the Project Schedule. No installation activities or deliveries will occur on Sundays or on state or federal holidays.

Q13. Please discuss the operation and maintenance activities for the Project.

A13. The system will be monitored remotely in real time, with an online system. The system will inform management about, for example, a sudden drop in power output, or an unusual output amount from one series of modules to the next. Site visits will be conducted on an as-needed basis. A long-term operations and maintenance contract will be in place with a maintenance company that will be responsible for keeping the system operating properly and for keeping the site mowed and the access road maintained.

Q14. Has the Petitioner provided 45-day notice to the entities listed in Commission Rule 5.402(A)?

A14. Yes, Novus 242 sent out a 45-Day Notice on November 7, 2025 describing the Project. A copy of the 45-Day Notice, including a full list of notified parties, was filed on ePUC and assigned Case No. 25-2786-AN.

Q15. Has the Petitioner received any comments in response to the 45-day notice?

A15. Yes, Novus 242 received some feedback from the Agency of Agriculture, Food and Markets ("AAFM") and from the Agency of Natural Resources ("ANR"). AAFM asked Novus 242 for some additional information regarding any previous mitigation on the site of primary agricultural soils, which Novus 242 responded to and has addressed in the prefiled testimony of Seth Goddard. ANR provided comments requesting that Novus 242 include the results of a Rare, Threatened and Endangered ("RTE") Plant Survey with the Petition, which is addressed in the Natural Resources Memo provided by Dori Barton in ***Exhibit N2S-DB-2***. Novus 242 has not received any questions about the Project from any adjoining landowner, Town, or Regional Planning Commission during the 45-day Advance Notice period.

Q16. Please identify who will pay for the Project's costs of interconnection.

A16. The Project will be responsible for any costs to interconnect the Project to VEC's system, including any upgrades identified in the interconnection review conducted by VEC as discussed further below.

Q17. Will the site be reclaimed prior to construction or operation of the Project?

A17. Yes. Prior to construction of the Project, the site will be reclaimed in accordance with the Act 250 Permit for the extraction operation and will be graded to a consistent slope. However, the final seed and mulch stabilization will occur after the Project construction is completed to avoid re-disturbance of these stabilization measures during construction.

Q18. Will Petitioner register all underground lines owned by the Project with DigSafe?

A18. Yes, Petitioner will register all underground lines that are owned by the Project that are outside the Project fence line with DigSafe and will comply with the rules of DigSafe for the life of the Project.

Q19. What are the plans for the site when the Project reaches the end of its useful life?

A19. As described in the Project's decommissioning plan, attached to my testimony as ***Exhibit N2S-AB-5***, at the end of the Project's useful life, the Project equipment will be removed from the site and sold, recycled, or disposed of in accordance with applicable waste regulations. An estimate of decommissioning costs of $120,650 is included in the decommissioning plan. Petitioner will obtain a letter of credit or other approved alternative security for this amount as a decommissioning fund, to be approved by the Commission prior to beginning site preparation or construction of the Project as set forth in the decommissioning plan. See ***Exhibit N2S-AB-5.***

Q20. Are there specific timing requirements that you are asking the Commission to consider for the timing of this proceeding?

A20. Yes. The Project is seeking to take advantage of the Investment Tax Credit, which will lower the cost of the Project and allow Petitioner to enter into a Power Purchase Agreement ("PPA") with VEC at a lower price for the Project output. Following changes to the federal tax credits 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 asking the Commission to issue a decision by June 2026. While Petitioner understands this will require an expedited proceeding schedule, the ending of the federal tax credits, which benefit Vermont utility customers through lower PPA prices, is good cause for such a request. 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.

SECTION 248 CRITERIA

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

Q21. Will the Project unduly interfere with the orderly development of the region?

A21. No. The Project will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the Town Planning Commission and Selectboard, as well as any applicable land conservation measures in the Town Plan and Regional Plans and substantial deference having been given to any applicable land conservation measures and specific policies contained in the Regional enhanced energy plan. Further detail is provided in the report provided by Lucy Thayer, ***Exhibit N2S-LT-2*****,** including relevant excerpts of the Town and Regional plans.

30 V.S.A. § 248(b)(1)(B) – Municipal Screening Requirements

Q22. Are there any municipal screening ordinances or bylaws for solar facilities that would apply to the Project? If so, does the Project comply with applicable screening ordinances or bylaws?

A22. Novus 242 has searched the Town of Jay website and the Town Development and Land Use Regulations adopted May 22, 2023 and has not found any solar screening ordinance or bylaw. Furthermore, as confirmed in the report of Lucy Thayer, ***Exhibit N2S-LT-2***, the Project Site is not visible from public vantage points or residences.

30 V.S.A. § 248(b)(2) – Need for the Project

Q23. Is the Project required to meet the need for present and future demand for service under Section 248(b)(2)?

A23. Yes. As noted above, Novus 242 had previously proposed a 500 kW net-metering facility on the Site. However, following discussions with VEC, Novus 242 was informed that VEC was interested in a larger project in order to secure more renewable energy through a long-term PPA to help meet VEC's obligations under the Vermont RES and to take advantage of expiring tax credits. Novus 242 and VEC have entered into a PPA for the Project, which was submitted to the Commission on November 18, 2025 pursuant to Commission Rule 5.202.[1] VEC also sent a letter to the Town and the adjoining landowners to the Project to explain VEC's role in the Project and interest in securing

[1] See Case No. 25-2862-PPA. Waiver of the 90-day notice period was granted by the Commission on December 26, 2025.

cost-effective, locally generated renewable energy at appropriately sited locations. See ***Exh. N2S-AB-6.*** The Project is expected to be able to qualify for these federal investment tax credits that are ending, which will help reduce costs for VEC ratepayers. Thus, the Project is needed to help VEC meet its obligations and supply its customers with cost-effective power.

30 V.S.A. § 248(b)(3) – System Stability and Reliability

Q24. Please describe the status of the Project's interconnection review by the interconnecting utility.

A24. In accordance with Rule 5.500, Petitioner submitted an interconnection application to VEC on November 5th, 2025. The Project design (see One-Line Diagram, ***Exhibit N2S-AB-4***) is currently in the process of interconnection review by VEC in a System Impact Study ("SIS"). A preliminary screening has been completed by VEC, which identified two screening criteria on which the Project required further study to determine what TGFOV mitigation is required and review the potential for unintentional islanding. The SIS is underway and will identify the scope of mitigation or upgrades that are required to address these issues.

While Petitioner understands that the Commission generally does not deem a petition complete until an SIS has been completed, Petitioner is asking the Commission to commence this proceeding while the SIS is still in progress due to unique circumstances of the timing constraints for qualification of federal tax credits (explained above), which

is entirely outside of Petitioner's control.[2] Petitioner is actively working with VEC towards the development of the larger version of this Project (to replace the NM Project, which has already been approved) in order to secure VEC additional supply of locally-generated renewable energy that includes federal tax credit benefits. As noted in the Petition, waiting until the SIS is complete prior to submitting this Petition could jeopardize the start of this Project's construction, since the timing of the SIS is entirely outside of Petitioner's control. Petitioner expects the SIS to be completed in the coming weeks and will file the results as soon as the study is issued.

Q25. Does Petitioner have any reason to expect there will be any material issues identified in the SIS with interconnection of the Project that could result in any undue adverse impacts on system stability or reliability?

A25. No. The preliminary screening for the Project identified only limited issues the be studied under the SIS. See ***Exhibit N2S-AB-7.*** Petitioner has discussed the current Project design with VEC with respect to potential issues with interconnection, and understands from VEC that at a preliminary level they do not anticipate the SIS for the larger Project to identify any major concerns with the Project interconnection based on capacity at the interconnecting substation. The SIS will provide a more in-depth review of any interconnection impacts and will identify the specific upgrades or mitigation measures that are required. Petitioner does not anticipate that this will include any major upgrades to distribution lines beyond the Project site. If such upgrades were required,

[2] See Petition, ¶ 12.

Petitioner will review and address any potential for substantial impacts on any Section 248 criteria resources in a supplemental filing.

Q26. Is there any other interconnection review in progress for the Project?

A26. Yes. While projects 5 MW or less in size are not generally subject to ISO-New England interconnection requirements, the Project is included in a cluster study review by ISO-NE of many smaller distribution level generation facilities. This study is anticipated to be completed by June of 2026. Petitioner has discussed this with VEC and understands from VEC they do not expect there to be any adverse impacts identified by ISO-NE due to the Project's interconnection to the distribution level system.

Q27. Who will pay for any system upgrades that may be required to interconnect the Project?

A27. Petitioner will be responsible for paying for any upgrades that are required in order to interconnect the Project. These upgrades will be completed prior to operation of the Project.

Q28. Will the Project enter into an interconnection agreement with VEC?

A28. Yes, prior to operation of the Project, Petitioner will enter into an interconnection agreement with VEC.

Q29. Will the Project adversely affect system stability and reliability?

A29. No, the Project will not adversely affect system stability and reliability. The Project will not move forward unless the SIS shows that the Project can interconnect to VEC's distribution system without adverse impacts to system stability or reliability, which it is expected to do. Petitioner will file the results of the SIS as soon as they are available for review by the Commission and the Department, and will pay for any necessary upgrades identified in the SIS, which will be completed prior to interconnection. Petitioner will address any potential impacts on natural resources as a result of any necessary upgrades, which are not anticipated at this time, in a supplemental filing if necessary. These steps will ensure that the Project will not result in any undue adverse impacts on system stability and reliability.

30 V.S.A. § 248(b)(4) – Economic Benefit

Q30. Will the Project result in economic benefits for the State and its residents? If so, please describe.

A30. Yes. As noted above, Petitioner is working with VEC to try to develop this Project in time to take advantage of federal tax credits that will help VEC add another long-term cost-stabilized generation resource to its portfolio before the economic benefits of the tax credits expire. See ***Exhibit N2S-AB-6.*** The Project will provide economic benefits to VEC customers in that the PPA price for this Project is anticipated to be lower than future projects that cannot obtain the credits that help lower the overall cost of developing the Project. In addition, the Project will provide economic benefits through lease payments to the landowner and through new municipal and state tax benefits. Each of these

benefits to the landowner, the local community, and the State will be larger than if the NM Project were to move forward. For example, based on the Uniform Capacity Tax Rate of $4.00/kW of plant capacity, the NM Project would pay $2,000 in state taxes each year of the Project's life ($4.00 x 500kW) where the 3.75 MW Project would be $15,000 ($4.00 x 3,750 kW). Over a lifetime of twenty-five years, the proposed Project would pay $375,000 in state taxes, which is $325,000 more than the NM Project would pay over the same lifetime. In addition, Petitioner will hire Vermont-based contractors and consultants for the Project where possible, including for engineering design, legal work, environmental and aesthetics review, and construction-related work. Each of these aspects of the Project will provide an economic benefit for the State or its residents.

As part of the PPA with VEC, Petitioner has also addressed the potential for any adverse economic impacts from the Project's location within the Sheffield Highgate Export Interface ("SHEI"). The PPA includes a "SHEI Transmission Fee" of $12.55/kWac to be paid by Petitioner to VEC as part of the interconnection costs for the Project. This mitigation fee is consistent with the mitigation fee that was approved for the NM Project and for other recent solar facilities. With this fee, the Project will offset any adverse economic impacts from any transmission constraints resulting from the Project's location. As the Project will offset any potential costs (which even if not offset, are far lower than the expected benefits) and will result in an overall economic benefit for the State and its residents.

30 V.S.A. § 248(b)(5) – Natural Environment & Use of Natural Resources

Q31. Has there been an investigation of the Project's potential impacts on the Natural Environment and Use of Natural Resources under Section 248(b)(5)?

A31. Yes. The Project's potential impacts on specific natural resources are addressed in the Arrowwood Environmental Report provided by witness Dori Barton as ***Exhibit N2S-DB-2***. Based on the results of the natural resources assessment, the Project will not have an undue adverse impact on the use of natural resources or the natural environment under any of the environmental criteria of Section 248(b)(5).

10 V.S.A. § 6086(a)(8) – Historic Sites

Q32. Will the Project have an undue adverse effect on historic sites?

A32. No, the Project will not have an undue adverse impact on either below or above-ground historic resources. There are no above-ground historic buildings on the parcel, and the Project will not be visible from public roads in the surrounding area or from any residences other than two houses on a private road (Mountain View Drive) that currently have views of the extraction operation. Additionally, the Vermont Division for Historic Preservation ("VDHP") previously reviewed the site with respect to the NM Project plans and confirmed via email that it had no cultural resource concerns with respect to that Project. While the footprint for the current Project is larger, the Project area has been previously disturbed due to the gravel pit operations. The Project will therefore not have an undue adverse impact on above or below-ground historic resources.

30 V.S.A. § 248(b)(5) – Transportation Systems

Q33. Will the Project cause unreasonable congestion or unsafe conditions with respect to transportation systems?

A33. No. Access to the site will be from an existing drive off Route 242 that has been used by large vehicles for the gravel extraction operation that has been present on the site for many years. During construction, Petitioner anticipates approximately 40-45(+/-) tractor trailers will deliver modules, racking, and inverters to the site over several weeks. Following construction, the traffic to the site will be less than the extraction operation, and will be limited to maintenance and repair visits a few times a year. Therefore, the Project will not result in any unreasonable congestion or unsafe traffic conditions.

30 V.S.A. § 248(b)(5) – Educational Services

Q34. Will the Project place an unreasonable burden on municipal educational services?

A34. No. The Project will not result in the addition of any new, school-aged children to the municipal school system that would impact the provision of educational services.

30 V.S.A. § 248(b)(5) – Municipal Services

Q35. Will the Project place an unreasonable burden on any other municipal services?

A35. No. The Project will not require any municipal water or sewer services, new roadway acceptance or maintenance by the Town of Jay, nor require any unique fire or police services beyond those typically required of other businesses.

30 V.S.A. § 248(b)(5) – Public Health and Safety

Q36. Will the Project have an undue adverse effect on public health and safety?

A36. No. All switchgear equipment will be inside locked UL-listed, code-approved electrical enclosures. Electrical lines that connect the string combiners to the inverters and switch gear enclosure, and from the mounted transformer to the point of interconnection will be located inside underground conduit. The fencing will be posted with appropriate electrical warning signs and/or placards. The fence will be locked and accessible only by Project personnel. As a result, there will be no undue adverse risk that the public, or wildlife, will access the Project equipment.

30 V.S.A Section 248(b)(5) – Greenhouse Gas

Q37. Will the Project result in undue adverse impacts with respect to Greenhouse Gases?

A37. No. The Project will not involve any industrial/manufacturing emissions. The Project will result in a new generation resource that will produce electricity for Vermont without emitting greenhouse gases during operation. Adding renewable energy resources like this Project will help reduce the need for carbon-based sources of electric energy and decrease Vermont's reliance on fossil fuel-based generation sources.

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

Q38. Will the Project unnecessarily or unreasonably endanger the public or quasi-public investments in adjacent lands, services, or facilities, or materially jeopardize or interfere with the public's use and enjoyment of those lands, services, or facilities?

A38. No, it will not. The Project is located on private land and at the end of a private road (Mountain View Drive). No public roads or other public resources will be physically impacted by the Project, nor will there be any material increase in traffic. And, as indicated in the report prepared by Lucy Thayer, the Project will not have adverse aesthetic impacts. See ***Exhibit N2S-LT-2***.

30 V.S.A. § 248(b)(6) – Least Cost Integrated Resource Plan

Q39. Is the Project consistent with the principles for resource selection expressed in an approved least cost integrated plan?

A39. Petitioner is not a retail distribution utility, and as such is not required to have an approved least-cost integrated plan. This criterion is therefore inapplicable, consistent with the Commission's approach to similar projects.

30 V.S.A. § 248(b)(7) – Vermont Electric Plan

Q40. Is the Project consistent with the 2022 Comprehensive Energy Plan (CEP)?

A40. Yes. The Project will contribute to meeting the state's long-term renewable energy goals because it is a renewable solar energy project that is located near load. The Project furthers key objectives of the CEP, which calls for meeting state energy goals largely through an increase in renewable resources. Specifically, the CEP includes a goal of

meeting 100% of energy needs through carbon-free resources by 2032, with at least 75% from renewable energy. As one of the last projects that may be able to take advantage of the current federal tax credits, this Project will also help further the goals of securing cost-effective and affordable resources and minimizing conversion of natural lands by utilizing a previously disturbed site. In addition, the payment of a SHEI Transmission Fee to VEC as part of the PPA is consistent with the recommendations in the CEP to consider economic mitigation fees in grid constrained areas such as the SHEI.[3] For these reasons, the Project is consistent with the CEP.

30 V.S.A. § 248(b)(10) – Transmission Facilities

Q41. Can the Project be served economically by existing or planned transmission facilities without an undue adverse effect on Vermont utilities or customers?

A41. Yes, the Project will interconnect to the VEC distribution system and will not interconnect to the transmission system. The SIS in progress will serve to confirm that the Project can interconnect safety to the distribution system and will identify any necessary upgrades that would need to be completed prior to interconnection. Petitioner will pay for any such upgrades to be complete before operating the Project, which will ensure that the Project does not result in any undue adverse impacts on Vermont utilities or customers. Additionally, through the SHEI Transmission Fee included in the PPA with VEC, the Project will pay to offset any potential cost impacts as a result of SHEI constraints from the Project's location, thus ensuring that the Project will not have an adverse economic impact on any existing or planned transmission facilities.

[3] See CEP at p. 253, 2022 Vermont Comprehensive Energy Plan

30 V.S.A. § 248(s) – Setbacks

Q42. Does the Project comply with the setback requirements in 30 V.S.A. § 248(s)?

A42. Yes, the Project's solar panels are set back at least 50' from each property boundary and approximately 525-ft from the edge of the nearest municipal highway (Route 242). See ***Exhibit N2S-AB-2***.

Q43. Does this conclude your testimony at this time?

A43. Yes, it does.