

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0261-PET

Petition of Novus 242 Solar LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 3.75 MW ground-mounted solar array in Jay, Vermont	
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**RESPONSE OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE
TO REQUEST FOR WAIVER OF COMPLETENESS REQUIREMENT**

On February 11, 2026, the Vermont Public Utility Commission issued a Memorandum in the above-captioned matter regarding Novus 242 Solar LLC’s (“Petitioner”) petition for the construction of a 3.75 MW solar facility in Jay, Vermont. The Memorandum explained that Commission staff determined, pursuant to Commission Rule 5.406, that the petition is incomplete due to insufficient information documenting compliance with Commission Rule 5.500 regarding interconnection procedures for electric generation facilities, as required by Commission Rule 5.403(A)(14), and insufficient information to support a positive finding under 30 V.S.A. § 248(b)(3) (system stability and reliability), as required by Commission Rule 5.403(A)(1). Noting the Petitioner’s request in the petition that the Commission waive the completeness requirement, the Memorandum explains that Petitioner’s request will be treated as a motion for a waiver pursuant to Commission Rules 2.107 and 5.415 and sets a deadline for responding to the motion of February 25, 2025.

In testimony filed in support of the petition, Alex Bravakis states that the System Impact Study is currently underway and expected to be completed in the coming weeks, and that Petitioner will file the results as soon as it is completed by Vermont Electric Cooperative (“VEC”). Petitioner seeks a waiver due to concerns about the expiration of the federal investment tax credits, in hopes that the Commission can initiate proceedings and establish a schedule for the proceeding while the

SIS is being completed. Petitioner asserts that the federal investment tax credit significantly impacts the cost and viability of the project.

The Department concludes that good cause exists for the Commission to grant a waiver of the completeness requirement pursuant to Commission Rules 2.107 and 5.415, given that the expiration of the federal investment tax credits are outside of Petitioner's control and have the potential to impact the project's viability. The Department recommends that the Commission grant Petitioner's request.

DATED at Montpelier, Vermont, this 25th day of February 2026.

Respectfully submitted,

VERMONT DEPARTMENT OF PUBLIC SERVICE

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