

Comments to the Vermont Public Utility Commission (PUC)

Re: Reference Case #25-2346-PET - Proposed 4.999 MW Solar Project in Lowell, Vermont by Northland Solar LLC (MHG Solar)

Submitted: November 10, 2025

Introduction:

Northeastern Vermont Development Association (NVDA) serves as the regional planning commission and economic development corporation for Caledonia, Essex, and Orleans Counties. Under 24 V.S.A. §4345a and Act 174, NVDA is responsible for preparing and maintaining a Regional Energy Plan that guides renewable energy development consistent with Vermont's statutory planning goals and regional land use policies.

NVDA appreciates the opportunity to comment on the proposed Northland Solar LLC (MHG Solar) project in the Orleans County Town of Lowell, and offers the following observations and recommendations regarding its consistency with regional planning objectives.

Regional Policy Context:

The [NVDA Regional Energy Plan \(2023\)](#) establishes a framework to advance renewable energy generation while protecting valued natural resources and supporting equitable local benefits.

Key policies, as stated on PDF pages 20–21 of the *NEK's Policy on the Development of Renewable Energy Resources* include the following:

- “Any utility-scale energy generation project deemed acceptable by the Public Utility Commission shall include a plan for distributing benefits to the towns in the region proportional to the adverse effects experienced by that town.”
- “This plan aims to balance environmental quality and important natural resources with energy production, with special emphasis on the value of forest lands in sequestering and storing carbon.”
- “Significant local and regional support and clearly demonstrated benefits, especially affordability and accessibility, should exist in any energy proposal.”

Accordingly, NVDA supports renewable energy projects that demonstrate tangible, proportional community benefits and are carefully sited to avoid undue adverse impacts to critical resources, settlement patterns, and long-term economic opportunities.

Site-Specific Considerations

Based on NVDA's Regional Energy Plan (PDF p.21), the proposed project area includes and is adjacent to state-designated agriculturally important soils, which are considered *possible constraints* for energy development.

In addition, NVDA's long-standing regional land use policy states that:

- “Rural areas should receive very little commercial or industrial development unless it occurs in an established industrial park, or in an area specifically designated in the local bylaw or plan as being well suited to such uses.”

Potential grid constraints in this area and the absence of back-up power for the proposed Northland Solar project is notable. As stated in the Regional Energy Plan (PDF p.20), “NVDA supports energy development that will not worsen already congested transmission, particularly in the Sheffield-Highgate Export Interface (SHEI)...Additionally, we will expect project developers to work with utilities and other stakeholders to explore innovative strategies that shift generation away from the hours when generation exceeds load within the SHEI area or otherwise avoids exacerbating congestion on the grid. An example of such a project would pair battery storage with a solar system to control when the project’s power is exported to the grid.”

NVDA also encourages (PDF p.22) the exploration of dual-use or co-location approaches—such as agrivoltaics, pollinator-friendly plantings, or community-solar models—that could integrate renewable generation while maintaining compatibility with surrounding land uses and advancing broader regional development goals. Examples include elevated or spaced panel configurations to support livestock grazing (e.g., sheep), pollinator-friendly native plantings to enhance soil and ecosystem health, and design approaches that complement agricultural and scenic values.

Conclusion:

While NVDA recognizes the importance of expanding renewable energy generation in-state, the proposed project does not align with the NVDA Regional Plan. NVDA would, however, be supportive of renewable energy projects that align more closely with regional planning objectives and that maximize co-benefits for small rural communities—including promoting agricultural viability, equitable local access to clean energy, and enhancing the resilience of the electric grid.

Respectfully submitted,

David Snedeker
Executive Director
Northeastern Vermont Development Association (NVDA)
dsnedeker@nvda.net | (802) 748-8303
36 Eastern Avenue
St. Johnsbury, VT 05819