

Comments to the Vermont Public Utility Commission (PUC)

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

Submitted: March 2, 2026

To the Commission:

These supplemental comments are respectfully submitted to further address the consistency of the proposed Northland Solar LLC project with the duly adopted Regional Plan of Northeastern Vermont Development Association (NVDA), and to highlight additional considerations regarding regional energy burden and environmental justice.

Substantial Deference to the NVDA Regional Plan:

The NVDA Regional Plan has received Substantial Deference under Vermont law. As such, its energy policies are entitled to enhanced weight in the Commission's Section 248 review.

The Regional Plan clearly defines *preferred locations* for solar development ([NVDA Regional Plan](#), PDF p.97) and these are stated as follows:

- Rooftops of structures, residential and commercial
- Brownfield sites not located in a designated downtown or village center
- Earth extraction sites (e.g. gravel pits, quarries), active or abandoned
- Parking lot canopies and surface parking lots
- Farms, where more than 50% of the power generated is used by the farm
- Industrial parks, where more than 50% of the power generated is used by the tenants of the industrial park
- Undersized lots and otherwise undevelopable land in existing industrial parks

The proposed Lowell project does not meet these preferred siting criteria.

The NEK is a Net Exporter of Energy:

The NVDA Regional Plan states plainly:

“With respect to simply how much electricity is generated here relative to what is consumed, the Northeast Kingdom is a net exporter of energy.” (PDF p.75)

In 2023, the Northeast Kingdom (NEK) generated approximately 1.76 million MWh of renewable electricity. Despite hosting only 8% of Vermont's population, the NEK already produces about one-third of the renewable electricity Vermont aspires to generate in-state by 2050. The NEK is not energy deficient. It is a clean-energy exporter region bearing a disproportionate share of Vermont's generation infrastructure relative to its population and load.

This raises an important policy question:

When a region is already exporting substantial renewable energy and experiencing transmission congestion constraints (including within the Sheffield-Highgate Export Interface-SHEI), does additional utility-scale generation in non-preferred, rural locations meaningfully advance the State's planning goals — or does it further concentrate impacts in a region already carrying an outsized burden?

Nevertheless, NVDA recognizes the importance of expanding renewable energy generation in-state and is supportive of renewable energy projects that provide co-benefits for small rural communities—including promoting agrivoltaics, equitable and affordable local access to renewable energy, and enhancing the resilience of the electric grid.

Grid Context and Regional Load Imbalance:

The NEK hosts significant renewable generation relative to its load. VEC grid mapping [resources](#) and regional data reflect ongoing congestion challenges in northern Vermont.

The Regional Plan (PDF p.94) explicitly states support for projects that:

- Do not worsen already congested transmission (including SHEI),
- Explore battery storage,
- Shift export timing to avoid peak congestion.

The proposed project does not include battery storage or demonstrated export controls.

Energy Burden and Environmental Justice Concerns in Lowell

Lowell exhibits multiple indicators of economic and energy vulnerability that warrant careful consideration in this proceeding. According to the [2023 Efficiency Vermont Energy Burden Report](#), Lowell's total household energy burden *exceeds 17%* when transportation, thermal, and electricity costs are combined, with average annual household energy expenses surpassing \$7,000. Even excluding transportation, Lowell's combined thermal and electricity burden *exceeds 8%*—well above the 6% threshold that national research identifies as “high energy burden,” a level associated with increased health risks, financial instability, and barriers to economic mobility.

Data from Vermont's [Municipal Vulnerability Indicators \(MVI\) Tool](#) further demonstrate that Lowell is *above* the state average in energy and transportation burden, housing and rentership cost burden, percentage of young residents, single-parent households, non-white residents, and outdoor workers, while falling *below* the state average in income and internet access. The municipality is also identified as having limited financial and staff capacity.

Under Vermont's [Environmental Justice Law](#), 3 V.S.A. § 6002(4), an “environmental justice focus population” includes any census block group in which the annual median household income is not more than 80 percent of the State median household income. American Community Survey 5-year estimates indicate that Lowell's median household income is below 80 percent of the Vermont statewide median, suggesting that one or more census block groups within Lowell may qualify as environmental justice focus populations under the statute. As a covered agency, the Commission must consider cumulative burdens and equitable distribution of environmental benefits when reviewing projects affecting such communities.

In this context, siting additional export-oriented generation in Lowell—without clearly demonstrated, proportional local benefit—raises legitimate environmental justice concerns. If Lowell households already face disproportionately high energy burdens, the central question becomes what measurable affordability, resilience, or access benefits will this project provide locally. Absent a binding community benefits agreement, dedicated low-income participation mechanisms, onsite resilience infrastructure, storage to mitigate grid impacts, or direct bill-reduction strategies, the project risks imposing long-term land-use impacts on a vulnerable community without delivering commensurate relief.

Conclusion:

The Northeast Kingdom is already a net renewable energy exporter contributing disproportionately to Vermont's clean energy portfolio. Further concentration of utility-scale generation in non-preferred, rural locations — absent direct and measurable local benefits — raises both regional planning conflicts and environmental justice concerns.

For these reasons, we urge the Commission to carefully weigh the substantial deference owed to the NVDA Regional Plan and determine that the proposed project does not align with duly adopted regional energy and land use policies.

Respectfully submitted,

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