

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 26-____-PET

Petition of Airport RD1 VT Solar, LLC, pursuant to 30)
V.S.A. § 248, requesting a certificate of public good)
for a 4.975 MW (AC) electric generation facility in)
Fair Haven, Vermont)

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

NOW COMES Airport RD1 VT Solar, LLC (Petitioner), by and through the undersigned counsel, to petition the Public Utility Commission for a certificate of public good, pursuant to 30 V.S.A. § 248, for a 4.975 MW (AC) solar electric generation facility to be located on Airport Road in Fair Haven, Vermont. In support of the petition, Petitioner represents:

1. Petitioner Airport RD1 VT Solar, LLC is a Vermont limited liability company with offices located at 15 Railroad Row, Suite 101 White River Junction, Vermont 05001.

2. Petitioner proposes to install a 4.975 MW (AC) fixed-tilt, ground-mounted solar electric generation facility on approximately 19± acres of a 105.21± acre parcel situated along Airport Road in Fair Haven, Vermont (the Project).

3. The Project will interconnect to a three-phase electric distribution line that will be served by the Green Mountain Power Fair Haven Substation that is being rebuilt in accordance with the Public Utility Commission's approval in Case No. 25-0593-PET.

4. Power from the Project will be sold at a competitive price through a bilateral agreement with a Vermont electric distribution utility, a contract under Commission Rule 4.100, or into the ISO New England markets.

5. On November 18, 2025, Petitioner provided advance notice of the Project to the persons and entities entitled to notice under 30 V.S.A. § 248(f) and Commission Rule 5.402. A certification of compliance with Section 248(f) and Commission Rule 4.502 accompanies this Petition.

6. Petitioner compiled the adjoining landowner list that accompanies this Petition in accordance with Commission Rule 5.402(A)(b). A certification of compliance with Rule 5.402(A)(b) accompanies this Petition.

7. This Petition is supported by prefiled evidence addressing the requirements set out in 30 V.S.A. § 248 and Commission Rules 5.400, 5.800, and 5.900. The witnesses and the subject matter of their testimony and exhibits are as follows:

Geoff Martin

Mr. Martin's testimony presents an overview of the Airport RD1 VT Solar Project and addresses the following criteria required by 30 V.S.A. § 248 and Commission Rule 5.400: summary of community outreach (Rule 5.403(A)(20)); summary of comments received in response to the 45-day advance notice (Rule 5.403(A)(3)); primary agricultural soils (Section 248(a)(4)(J)(ii) & (b)(5)); solar setbacks (Section 248(s)); municipal screening ordinance (Section 248(b)(1)(B)); adjacent facilities (Rule 5.403(A)(19)); need (Section 248(b)(2)); electric system stability and reliability (Section 248(b)(3)); economic benefit to the State and

its residents (Section 248(b)(4)); air and water purity and pollution (Section 248(b)(5)); use of natural resources (Section 248(b)(5)); greenhouse gas emissions (Section 248(b)(5)); waste disposal (Section 248(b)(5) & 10 V.S.A. § 6086(a)(1)(B)); water conservation, burden on existing water supply, and sufficiency of water (Section 248(b)(5) & 10 V.S.A. §§ 6086(a)(1)(C), (2), (3)); soil erosion (Section 248(b)(5) & 10 V.S.A. § 6086(a)(4)); traffic and transportation (Section 248(b)(5) & 10 V.S.A. § 6086(a)(5)); municipal and educational services (Section 248(b)(5) & 10 V.S.A. § 6086(a)(6)&(7)); historic sites (Section 248(b)(5) & 10 V.S.A. § 6086(a)(8)); development affecting public investments (Section 248(b)(5) & 10 V.S.A. § 6086(a)(9)(K)); public health and safety (Section 248(b)(5)); consistency with the Vermont Electric Plan (Section 248(b)(7)); impact on Vermont utilities and their customers (Section 248(b)(10)); decommissioning (Rule 5.403(A)(14) & Rule 5.900).

Seth D. Goddard

Mr. Goddard presents the Airport RD1 VT Solar Project's site plans, erosion prevention and sediment control plan, elevation drawings, and sound study. He describes the ground disturbance, vegetation clearing, and impacts to primary agricultural soils involved in the Project's site preparation and construction and provides details on the proposed wetland crossing and secondary oil containment plans. Mr. Goddard's testimony also addresses the Act 250 soil erosion criterion given due consideration in 30 V.S.A. § 248(b)(5) and explains the basis for the decommissioning cost estimate included in Exhibit PET-GM-7 offered with the Prefiled Testimony of Geoff Martin.

Adam Crary

Mr. Crary presents the Natural Resources Assessment prepared for the Airport RD1 VT Solar Project by VHB. His testimony addresses the Project's potential impacts on the following Section 248(b) natural environment review criteria, giving due consideration to the Act 250 criteria incorporated into Section 248(b)(5): headwaters (10 V.S.A. § 6086(a)(1)(A)); floodways (10 V.S.A. § 6086(a)(1)(D)); streams (10 V.S.A. §

6086(a)(1)(E)); shorelines (10 V.S.A. § 6086(a)(1)(F)); wetlands (10 V.S.A. § 6086(a)(1)(G)); rare and irreplaceable natural areas (10 V.S.A. § 6086(a)(8)); necessary wildlife habitat and endangered species (10 V.S.A. § 6086(a)(8)(A)); and outstanding resource waters (Section 248(b)(8) & 10 V.S.A. § 1424a(d)).

Michael Willard

Mr. Willard's testimony addresses the Project's consistency with the orderly development of the region (Section § 248(b)(1)) and its expected aesthetics impact (Section 248(b)(5) & 10 V.S.A. § 6086(a)(8)).

8. An index of evidence accompanies this Petition as required by Commission Rule 5.403(A)(16).

9. The testimony and exhibits filed in support of this Petition demonstrate that the Project satisfies the review criteria under 30 V.S.A. § 248(b) and will promote the general good of the State.

WHEREFORE, Petitioner Airport RD1 VT Solar, LLC respectfully requests that the Commission:

- A. Hold a scheduling conference at the earliest opportunity;
- B. Find that the Project satisfies the criteria under 30 V.S.A. § 248(b) and will promote the general good of the state;
- C. Issue the Project a certificate of public good authorizing Petitioner to own and operate the Project; and

D. Issue any other further relief that the Commission deems just and proper.

AIRPORT RD1 VT SOLAR, LLC

By: /s/ Leslie A. Cadwell

Leslie A. Cadwell

Legal Counselors & Advocates, PLC

PO Box 827

Castleton, VT 05735

(802) 342-3114

lac@lac-lca.com

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