

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)

PREFILED TESTIMONY AND EXHIBITS OF GEOFF MARTIN

Summary of testimony: 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).

EXHIBIT LIST	ii
Introduction and Qualifications	1
Purpose of Testimony.....	1
Project Background and Description	3
Rule 5.403(A)(20): Summary of Community Outreach Efforts	6
Rule 5.403(A)(3): Summary of Comments Received in the 45-Day Advance Notice Period ..	7
Section 248(a)(4)(J)(ii) and 248(b)(5): Primary Agricultural Soils	8
Section 248(s): Setbacks	9
30 V.S.A. § 248(b)(1)(B): Municipal Screening Ordinance	9
Rule 5.403(A)(19): Adjacent Facilities	9
Section 248(b)(2): Need for Present and Future Demand for Service	10
Section 248(b)(3): Impact on Electric System Stability and Reliability.....	11
Section 248(b)(4): Economic Benefit to the State and Its Residents	12
Section 248(b)(5): Air and Water Purity, Use of Natural Resources, Greenhouse Gas Impacts, Waste Disposal, Water Conservation, Burden on Existing Water Supply, Sufficiency of Water, Soil Erosion, Traffic and Transportation, Municipal and Educational Services, Historic Sites, Development Affecting Public Investments, Public Health and Safety.....	14
Air and Water Purity and Pollution.....	14
Use of Natural Resources	14
Greenhouse Gas Emissions	15
Waste Disposal	15
Water Conservation, Burden on Existing Water Supply, Sufficiency of Water	15
Soil Erosion	16
Traffic and Transportation	16
Municipal Services and Educational Services	17
Historic Sites.....	17
Development Affecting Public Investments	18
Public Health and Safety	19
Section 248(b)(7): Consistency with the Vermont Electric Plan.....	19
Section 248(b)(10): Impact on Vermont Utilities or Customers	21
Rules 5.403(A)(14) & 5.900: Decommissioning	21

Conclusion and Declaration	22
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EXHIBIT LIST

Exhibit PET-GM-1	Martin Resume
Exhibit PET-GM-2	Equipment Data Sheets
Exhibit PET-GM-3	Proposed Conditions to Protect Primary Agricultural Soils
Exhibit PET-GM-4	GMP Feasibility Study
Exhibit PET-GM-5	Crown Consulting Archaeology, LLC End of Field Letter Report
Exhibit PET-GM-6	Historic Sites Memorandum of Understanding
Exhibit PET-GM-7	Decommissioning Plan, Cost Estimate, Sample Irrevocable Standby Letter of Credit

Introduction and Qualifications

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

A1. My name is Geoff Martin. I am Development Project Manager for Breakaway Renewables, a division of Norwich Technologies, Inc., and my business address is 15 Railroad Row, Suite 101, White River Junction, Vermont.

Q2. Please describe your educational background and professional experience.

A2. I have a Bachelor's in Development Studies from Brown University and a Master's in Environmental Sciences from Emory University. I have been Development Project Manager at Norwich Technologies for over three years and am responsible for the development of our solar energy projects. Previously, I was Intermunicipal Regional Energy Coordinator (IREC) with Two Rivers-Ottawaquechee Regional Commission (TRORC), where I worked with seven of TRORC's member towns to help them lessen overall energy use, lower greenhouse gas emissions, and move to renewable generation of electricity. I served as the Town of Hartford Energy Coordinator and worked as a BPI-certified energy auditor. See Exhibit PET-GM-1, which sets forth my educational background and professional experience in more detail.

Purpose of Testimony

Q3. What is the purpose of your testimony?

A3. My testimony presents the Airport RD1 VT Solar Project and explains its potential impacts on various review criteria applicable to a 4.975 MW (AC) ground mounted

1 solar array under 30 V.S.A. § 248 and Public Utility Commission Rules. Specifically,
2 my testimony provides the project narrative and addresses the following review
3 criteria required by Section 248 and Commission rules: a summary of community
4 outreach and comments received in response to the 45-day advance notice and the
5 Project's response thereto (Rule 5.403(A)(3) & (20)); primary agricultural soils
6 (Section 248(a)(4)(J)(ii), (b)(5) & Rule 5.403(A)(11)); setbacks (Section 248(s);
7 municipal screening ordinance (Section 248(b)(1)(B)); adjacent facilities (Rule
8 5.403(A)(19)); need (Section 248(b)(2)); impact on system stability and reliability
9 (Section 248(b)(3)); net economic benefit to the State and its residents (Section
10 248(b)(4)); use of natural resources (Section 248(b)(5)); greenhouse gas emissions
11 (Section 248(b)(5)); waste disposal (Section 248(b)(5) & 10 V.S.A. § 6086(a)(1)(B));
12 water conservation, burden on existing water supply & sufficiency of water (Section
13 248(b)(5) & 10 V.S.A. §§ 6086(a)(1)(C), (2), (3)); soil erosion (Section 248(b)(5) & 10
14 V.S.A. § 6086(a)(4)); traffic and transportation (Section 248(b)(5) & 10 V.S.A. §
15 6086(a)(5)); municipal and educational services (Section 248(b)(5) & 10 V.S.A. §
16 6086(a)(6)&(7)); historic sites (Section 248(b)(5) & 10 V.S.A. § 6086(a)(8));
17 development affecting public investments (Section 248(b)(5) & 10 V.S.A. §
18 6086(a)(9)(K)); public health and safety (Section 248(b)(5)); consistency with the
19 Vermont Electric Plan (Section 248(b)(7)); impact on Vermont utilities and their
20 customers (Section 248(b)(10)); and decommissioning (Rule 5.403(A)(14) & Rule
21 5.900).

Project Background and Description

Q4. Please describe the Project and its location.

A4. The Project is a 4.975 MW ground-mounted solar array sited on a portion of a 105.21± acre parcel of land (SPAN# 216-070-11165) located off Airport Road in Fair Haven. The property is undeveloped and is characterized by open and forested areas and some wetlands. The array is designed to avoid wetland areas and their buffers to the extent practicable and will be comprised of two sections. Each section will have multiple rows of solar panels on fixed-tilt ground-mounted racks made from galvanized metal. The solar panels will be dark in color and have an anti-reflective coating to minimize glare. The two array sections will comprise approximately 19.1± acres within the 23.02± acre limit of disturbance. The array rows in each section will vary in length and will generally run east to west with the panels facing south. The array is low profile with the solar panels supported at approximately 3 feet off the ground with a maximum height of approximately 15 feet from ground level. An eight-foot-high agricultural style perimeter fence will enclose each array section. In the event a fence is not used, energized equipment rated for outdoor use will be secured by locked enclosure covers, also compliant with NEC code "Guarding of Live Parts." The site will be accessed via an existing farm road that will be upgraded with gravel and widened to twelve feet to accommodate construction deliveries and equipment. A section of the farm road near the entrance off Airport Road will be rerouted as shown on the Site Plan, and the portion of the

1 existing farm road not used for the Project access will be revegetated after
2 construction. See Exhibit PET-SDG-2, Sheet C-101. The racking and fence posts will
3 be installed by driving or screwing the posts into the ground without the need for
4 excavation. The Project will not require any exterior lighting or sanitary facilities.

5 Most of the Project components are sited in an open agricultural field.
6 Approximately 4.3± acres of tree/vegetation clearing (including stumping and
7 grubbing) are needed to install the two array sections, and approximately 2.32±
8 acres will be managed to minimize shading (with no stumping or grubbing). These
9 areas are shown on the Site Plan, Exhibit PET-SDG-2. To access the southern array
10 area, a section of new access road will be constructed that will involve a single
11 crossing of a wetland area. Details of the wetland crossing are shown on the Site
12 Plan (Exhibit PET-SDG-2, Sheet C-101) and are discussed in the Prefiled Testimony
13 of Seth Goddard at page 7, Prefiled Testimony of Adam Crary at page 6 and Exhibit
14 PET-AC-2 at page 8. The Project is designed to minimize the amount of new
15 impervious surfaces. The Project includes some landscape plantings to help screen
16 views of the northern array section from a private residence at the end of Airport
17 Road and views of the southern array section from U.S. Route 4. The Project's
18 aesthetics and landscape plan are addressed in more detail in Mike Willard's
19 prefiled testimony and accompanying aesthetics report (Exhibit PET-MW-2).
20 Impacts to natural resources and required environmental permits are addressed in

1 more detail in Adam Crary's prefiled testimony and accompanying report (Exhibit
2 PET-AC-2).

3 A new line extension will interconnect the Project with Green Mountain
4 Power's (GMP) electric distribution system at a new utility pole located along Airport
5 Road just north of the Project's new gravel access. See Exhibit PET-SDG-2. Utility
6 poles will be installed along the Project's gravel access road for the line extension
7 and utility and Project equipment. The interconnection line will then run
8 underground and connect with the Project's two 2,500 kVA pad-mounted
9 transformers serving each of the array sections. The transformers will use non-
10 toxic, biodegradable oil and will include a secondary oil containment system.
11 Please refer to the Prefiled Testimony of Seth Goddard and Exhibit PET-SDG-2,
12 Sheet C-107 for more details on the secondary oil containment system,
13 construction and operational stormwater considerations, and required permits. The
14 Project's inverters, which convert the array's direct current (DC) output to
15 alternating current (AC), will be mounted behind the solar panel racking in locations
16 close to each of the Project's pad-mounted transformers. See Exhibit PET-SDG-2,
17 Sheet C-101. All wiring connecting the solar panels within the array sections will be
18 installed in underground conduit. Exhibit PET-GM-2 provides representative
19 examples of the solar panels, racking, and inverters that will be used. Final
20 equipment selection will be made after permitting is complete and vendors are
21 chosen.

1 Q5. How will materials and equipment be transported to the Project site?

2 A5. Project materials and equipment will be transported to the site by standard-size
3 delivery vehicles without the need for special permits or traffic controls.

4 Q6. What are the installation hours and how long will it take to complete the Project?

5 A6. Delivery and construction hours will be from 7AM to 7PM Monday-Friday, and if
6 needed 8AM-5PM on Saturday. No deliveries or work will take place on Sundays or
7 State and Federal holidays. We anticipate installation will take approximately 35-40
8 weeks.

9 Q7. How will the Project be maintained?

10 A7. The Project will be monitored remotely with periodic inspections and maintenance
11 performed as required.

12 Q8. What is the expected energy production from the Project?

13 A8. We estimate that the Project will generate approximately 8,017 megawatt hours of
14 electricity annually.

15 **Rule 5.403(A)(20): Summary of Community Outreach Efforts**

16 Q9. Please summarize your community outreach efforts in advance of filing the Petition
17 for a CPG.

1 A9. A Project representative met with the Fair Haven Selectboard on April 30, 2024, to
2 introduce the Project and propose a tax stabilization agreement. The 45-day notice
3 was sent to the Fair Haven Selectboard, Fair Haven Planning Commission, and
4 adjoining landowners in November 2025. No comments were received from any
5 town officials or adjoining landowners. In January 2026, I contacted the Fair Haven
6 Town Manager to inquire whether the Selectboard or Planning Commission was
7 interested in an updated presentation about the Project and was informed that a
8 presentation was not necessary. In January and February 2026, attempts were
9 made to discuss the Project with the Director of the Rutland Regional Planning
10 Commission, and on February 27, 2026 a Project representative sent an email to
11 confirm that the RRPC had no questions regarding the Project. No response from
12 the RRPC was received.

13 **Rule 5.403(A)(3): Summary of Comments Received in the 45-Day Advance**
14 **Notice Period**

15 Q10. Please summarize the comments you received in response to the November 18,
16 2025, 45-day advance notice issued for the Project.

17 A10. We received comments from the Agency of Natural Resources (ANR) on December
18 30, 2025, and from the Agency of Agriculture, Food & Markets (AAFM) on February
19 27 2026. ANR's comments addressed fisheries; wetlands; significant natural
20 communities; rare, threatened, and endangered species (birds, reptiles, and bats).
21 The comments asked that the site plan filed with the petition depict the location of

1 various resources and proposed CPG conditions to protect certain natural
2 resources identified in the letter. The comments also provided contact information
3 for agency experts so Project representatives could discuss or get clarification on
4 ANR's requests. The Project has addressed the issues raised by ANR's comments in
5 the natural resources assessment prepared for the Project by VHB, (Exhibit PET-AC-
6 2), the Prefiled Testimony of Adam Crary, and the Site Plan (Exhibit PET-SDG-2).

7 AAFM's comments noted that Project site plan must show all primary
8 agricultural soils (PAS) within the limit of disturbance, including areas with soils that
9 are not mapped as PAS but have been recently used for agricultural. AAFM
10 comments also requested that the Project locate any PAS stockpiles within the
11 perimeter fence and provided a set of conditions that AAFM typically requests to be
12 included in a solar project CPG. The Project site plan shows the PAS within the
13 Project limit of disturbance (LOD), including non-mapped PAS that was in recent
14 agricultural use. The PAS stockpiles are located within the perimeter fence as
15 shown on the Project Site Plan. The CPG conditions AAFM requested are included in
16 Exhibit PET-GM-3, as explained below.

17 **Section 248(a)(4)(J)(ii) and 248(b)(5): Primary Agricultural Soils**

18 Q11. What impact will the Project have on primary agricultural soils?

19 A11. There are approximately 22.35± acres of primary agricultural soil within the
20 Project's LOD as shown on the site plan (Exhibit PET-SDG-2, Sheet C-101 Impact

1 Area Calculations). Of that amount, approximately 5.37± acres of soil will be
2 disturbed by stumping and grubbing, trenching, access road work, and equipment
3 pad installation. The Project will be installed and decommissioned in compliance
4 with the conditions typically recommended by AAFM to protect primary agricultural
5 soils on a solar array site. These conditions are set out in Exhibit PET-GM-3 and
6 should be included in Petitioner's CPG.

7 **Section 248(s): Setbacks**

8 Q12. Please state whether the Project meets the statutory setback distances set out in
9 Section 248(s).

10 A12. Yes, it does. The Project is set back from the traveled way of Airport Road by
11 approximately 167± feet and from US Route 4 by approximately 251± feet. The
12 setbacks from the property boundaries are 1,254± feet on the north, 117± feet on
13 the south, 131± feet on the east, and 127± feet on the west.

14 **30 V.S.A. § 248(b)(1)(B): Municipal Screening Ordinance**

15 Q13. Has the Town of Fair Haven adopted a solar screening ordinance or bylaw that
16 applies to the Project?

17 A13. No, it has not.

18 **Rule 5.403(A)(19): Adjacent Facilities**

19 Q14. Please identify any other existing, approved, proposed, or planned solar array that is
20 located on the same or adjacent parcel as the Project.

1 A14. There is an approved 20 MW (AC) ground-mounted solar array on an adjacent
2 parcel. The facility, called “Fair Haven Solar,” was developed by VT Real Estate
3 Holdings 2 LLC, a Delaware limited liability company, and was granted a CPG on
4 November 27, 2025, in Case No. 24-2945-PET. Fair Haven Solar and this Project
5 were developed independently. Airport RD1 VT Solar, LLC and VT Real Estate
6 Holdings 2 LLC are unrelated legal entities with no common ownership or affiliation.
7 This Project and Fair Haven Solar do not share any infrastructure, although both will
8 interconnect with the new GMP Fair Haven substation approved in Case No. 25-
9 0593-PET. Additionally, while Fair Haven Solar’s approved plans for interconnection
10 include an underground electric line running through Airport RD1 VT Solar’s
11 exclusive leased area, I have been informed that Fair Haven Solar has since
12 changed its plans for the interconnection line and will not have any infrastructure
13 on the property hosting the Airport RD1 VT Solar Project.

14 **Section 248(b)(2): Need for Present and Future Demand for Service**

15 Q15. Please explain whether the Project is required to meet present and future demand
16 for electric service that cannot otherwise be provided in a more cost-effective
17 manner through energy conservation programs and measures and energy efficiency
18 and load management.

19 A15. The Project is needed to provide a new source of electric generation fueled by
20 renewable energy. The need for new renewable energy in Vermont and the ISO New

England region cannot be met through energy conservation programs, energy efficiency measures, or load management. According to the 2022 Comprehensive Energy Plan (“CEP”), Vermont’s electricity demand is anticipated to more than double by 2050.¹ This Project is estimated to produce 8,017 MWh hours of energy to help meet this growing demand for renewable energy in Vermont and New England. In Vermont, the CEP sets a goal of obtaining 75% of the State’s energy needs from renewable resources by 2032. Power from the Project will be sold at a competitive price through a bilateral agreement with a Vermont electric distribution utility, a contract under Rule 4.100, or into the ISO New England markets. As a Project being developed by a non-utility company, Vermont’s electric ratepayers are not financing the Project’s development or construction costs.

Section 248(b)(3): Impact on Electric System Stability and Reliability

Q16. What impact will the Project have on electric system stability and reliability?

A16. The Project will not have an undue adverse impact on electric system stability and reliability. GMP completed a feasibility study of the Project in October 2025 and concluded that the Project could proceed to interconnection without a system impact study or facilities study, provided certain measures are completed before interconnection. See Exhibit PET-GM-4. These measures are:

- Construction of an approximately 500-foot three-phase line extension to two pad mounted 2,500 kVA, 12470/7200 volt grounded-wye to 600/346 volt

¹ CEP P. 231-232, 259.

grounded-wye transformers, a primary metering package, and disconnect switch/es

- Installation of a Viper-S PCC recloser programmed with live line reclose block
- Upgrading the existing primary three-phase conductor from Line AIRPORT Pole 8 to the Project POI to three-phase 336 ACSR (approximately 520 feet)
- Use of inverters that comply with the Inverter Source Requirement Document of ISO New England (ISO-NE SRD)
- Inverters must reconnect using a Soft-Start Ramp rate of 2% of maximum current output per second with a modified reconnection time of six minutes
- Execution of a Project Notice to Proceed with the appropriate GMP distribution engineer when the Project is ready for interconnection
- Approval of a generation notification form with ISO New England

Airport RD1 VT Solar will implement the interconnection requirements detailed in the feasibility study and will pay for the upgrades and monthly SCADA costs that are the Project's responsibility.

Section 248(b)(4): Economic Benefit to the State and Its Residents

Q17. What economic benefits to the State and its residents will result from the Project?

A17. The Project will provide several important economic benefits to the State and its residents, including contributing beneficial state and municipal tax payments. The Project will annually contribute an energy generation production tax to the State General Fund, as well as pay Town property taxes.

The Project will contribute to lowering the state's greenhouse gas emissions in line with the requirements of the 2020 Global Warming Solutions Act, which recognizes the economic threat that climate change poses to the state. According

1 to the Initial Vermont Climate Action Plan, the economic impacts of climate change
2 in Vermont are wide ranging, including weather related damages to residential and
3 commercial property, impacts to human health, and disruption to production and
4 supply chains.² These impacts are expected to worsen with every increment of
5 global warming,³ making the implementation of climate solutions such as new
6 renewable energy projects an important strategy in mitigating negative impacts to
7 Vermont's economy.

8 The Project also will support numerous clean energy economy jobs from
9 environmental assessments, civil and electrical engineering and development work
10 through design, installation and operation and maintenance services, and the
11 Project will purchase equipment, materials and supplies from Vermont businesses,
12 where feasible.

² Initial Vermont Climate Action Plan. Vermont Climate Council. December, 2021.

³ IPCC, 2023: Summary for Policymakers. In Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland. <https://doi.org/10.59327/IPCC/AR6-9789291691647.001>.

Section 248(b)(5): Air and Water Purity, Use of Natural Resources, Greenhouse Gas Impacts, Waste Disposal, Water Conservation, Burden on Existing Water Supply, Sufficiency of Water, Soil Erosion, Traffic and Transportation, Municipal and Educational Services, Historic Sites, Development Affecting Public Investments, Public Health and Safety.

Air and Water Purity and Pollution

Q18. Will the Project result in undue adverse impacts on air and water purity or cause undue air and water pollution?

A18. No, it will not. The only source of air emissions associated with the Project's construction and operation are fossil-fueled vehicles and equipment used for deliveries, worker transportation, and installation activities. Emissions associated with these activities will be short-term and typical of similar construction projects. The Project's design and construction will protect water quality and avoid water pollution by implementing appropriate erosion controls measures. Please also refer to the Prefiled Testimony of Adam Crary and Exhibit PET-AC-2 for details on how the Project will ensure no undue adverse impacts on headwaters, floodways, streams, shorelines, and wetlands, and the Prefiled Testimony of Seth Goddard on stormwater.

Use of Natural Resources

Q19. How will the Project use of natural resources?

A19. The Project's use of natural resources will not be undue. The Project will require the use of fossil fuel-powered vehicles and equipment during installation and

1 maintenance activities and the sun to generate electricity once commissioned.

2 Water may be used in connection with dust control and germination of reseeded
3 areas. All of these uses are limited in scope and duration.

4 *Greenhouse Gas Emissions*

5 Q20. What greenhouse gas emissions are associated with the Project's installation and
6 operation?

7 A20. The Project's greenhouse gas emissions will be limited to emissions from fossil-
8 fueled vehicles and equipment during installation and maintenance activities (e.g.
9 mowing and vegetation management) and will not be undue.

10 *Waste Disposal*

11 Q21. How will waste resulting from the Project's construction and operation be handled?

12 A21. The Project will meet all applicable Vermont Department of Environmental
13 Conservation (DEC) and Vermont Health Department regulations regarding the
14 disposal of waste and will not involve the injection of waste materials or harmful
15 toxic substances into the groundwater or wells. The Project will not require any
16 onsite sanitary or wastewater facilities. All waste generated during installation,
17 operations, and decommissioning will be safely disposed of in accordance with
18 applicable DEC regulations.

19 *Water Conservation, Burden on Existing Water Supply, Sufficiency of Water*

20 Q22. How will the Project use and conserve water?

1 A22. The Project's water use during installation will be limited to dust control, if
2 necessary, and to germinate reseeded areas. Water for these uses will be brought
3 to the site by truck. Water is not required for the Project's operation.

4 *Soil Erosion*

5 Q23. Will the Project cause unreasonable soil erosion or reduce the capacity of the land
6 to hold water so that a dangerous or unhealthy condition may result?

7 A23. No, it will not. The Project involves minimal grading and limited impervious
8 surfaces. Installation will be done in accordance with stormwater regulations and
9 permit conditions, as well as The Vermont Standards and Specifications for Erosion
10 Prevention and Sediment Control (June 2025). Please refer to the Prefiled Testimony
11 of Seth D. Goddard and Exhibit PET-SDG-2 for more information on stormwater
12 requirements and impervious surfaces.

13 *Traffic and Transportation*

14 Q24. Will the Project cause unreasonable congestion or unsafe conditions with respect
15 to the use of highways, waterways, railways, airports or airways?

16 A24. No, it will not. Traffic associated with the Project's installation, including deliveries
17 of materials and equipment, will be temporary. Installation will not require any
18 oversized vehicles, special transportation permits, or traffic controls.

Municipal Services and Educational Services

Q25. What impact will the Project have on the ability of the town to provide municipal or other government services?

A25. The Project will not require any special municipal services or interfere with the Town of Fair Haven's provision of municipal or other governmental services to the community.

Q26. Will the Project result in an unreasonable burden on the ability of a municipality to provide educational services?

A26. No, it will not. The Project does not require on-site staffing or require workers to move to the area. As such, the Project will not place any burden on Fair Haven's provision of educational services.

Historic Sites

Q27. Will the Project have an undue adverse impact on historic sites?

A27. No, it will not. In February 2024, the Project submitted a request to the Vermont Division of Historic Preservation (VDHP) to review the Project's potential impacts on historic resources and later sent the 45-day advance notice to VDHP to solicit input on the Project. VDHP reviewed the Project and concluded that it will not have any impact on above-ground resources. See Exhibit PET-GM-6 at 2.

As to potential below-ground historic resources, the Project parcel was determined to be archeologically sensitive. In 2022 and 2024, Crown Consulting

1 Archaeology, LLC performed a Phase I archaeological review of the parcel's open
2 fields where the Project's solar arrays are sited. Crown Consulting identified two
3 potential archaeological sites in the northern field during the 2024 review after
4 finding two artifacts on the surface. Subsequent subsurface testing of the sites
5 revealed no additional artifacts. As a result, Crown Consulting determined that the
6 two surface artifacts were isolated and the archaeological sites are not considered
7 to be significant cultural sites. Additional archaeological work is necessary to clear
8 two wooded areas on the parcel within the LOD. See Exhibit PET-GM-5, Figure 7 for
9 the location of these wooded areas. The Project and VDHP have entered a
10 Memorandum of Understanding (MOU) related to that work that will ensure the
11 Project will not have an undue adverse impact on potential below-ground historic
12 resources. I offer the MOU with my testimony as Exhibit PET-GM-6. The Project will
13 adhere to the requirements of the MOU, which require an archaeological
14 investigation to be completed before any site preparation or installation activities
15 take place. By adhering to the terms of the MOU, the Project will not have an undue
16 adverse impact on historic resources.

17 *Development Affecting Public Investments*

18 Q28. Will the Project materially jeopardize or unreasonably interfere with the function,
19 efficiency, or safety of, or the public's use and enjoyment of or access to any public
20 or quasi-public investment, service or lands?

1 A28. No, it will not. The only public investment potentially impacted by the Project are
2 public roads, Airport Road in particular. Traffic associated with the Project's
3 installation will be temporary and not unduly interfere with the public's use of the
4 Airport Road or other nearby roadways.

5 *Public Health and Safety*

6 Q29. Will the Project have an undue adverse impact on public health and safety?

7 A29. No, it will not. The Project will be installed, operated, and maintained in compliance
8 with applicable safety codes. The Project will be protected by an 8-foot fixed-knot
9 wildlife perimeter fence with warning signs to protect against unauthorized access.
10 If a fence is not installed, energized equipment rated for outdoor use will be secured
11 by locked enclosure covers and compliant with NEC Code "Guarding of Live Parts."
12 With respect to the sound emissions from the Project's sound-emitting equipment
13 (transformers and inverters), the maximum daytime sound pressure level at the
14 nearest residence will be approximately 32.4 dBA not accounting for background
15 noise, topography, and structures. The nighttime level is projected to be no more
16 than 15.8 dBA. Please refer to the sound assessment (Exhibit PET-SDG-4) offered
17 with the Prefiled Testimony of Seth D. Goddard. Finally, as I mentioned previously,
18 the Project will use solar panels with an anti-glare coating to prevent undue glare.

19 **Section 248(b)(7): Consistency with the Vermont Electric Plan**

20 Q30. How is the Project consistent with the Vermont Electric Plan?

1 A30. The current Vermont Electric Plan is part of the 2022 Comprehensive Energy Plan
2 (2022 CEP) that sets the State’s renewable energy goals.⁴ The 2022 CEP builds on
3 renewable energy targets set by prior plans published in 2011 and 2016 that
4 established overall goals for renewable energy to meet the State’s energy demand.
5 (2022 CEP at 25.) Those goals are 45% by 2035 and 90% by 2050. (2022 CEP at 25.)
6 The Electric Sector specific goal set out in the 2022 CEP is 100% of the State’s
7 energy needs being met from carbon-free sources by 2032, with at least 75%
8 coming from renewable sources. (2022 CEP at 25.) Achieving these goals aids
9 Vermont’s progress toward reducing greenhouse gas emissions as contemplated
10 by the Global Warming Solutions Act (Act 153 of 2020). (2022 CEP at 25.) The 2022
11 CEP explains that “electrification necessary to meet our goals will increase
12 electricity consumption by approximately 16% by 2025 and over double by 2050,”
13 requiring cost effective resources to meet our growing demand. (2022 CEP at 231-
14 32.) The CEP provides that distributed generation resources should be sited in areas
15 without grid constraints to help contain costs. (2022 CEP at 266.) The Project is
16 consistent with the Vermont Electric Plan because it is a low-carbon, renewable
17 energy resource sited to interconnect with a new GMP substation that will have the
18 capacity to serve it without upgrades and additional costs to ratepayers.

⁴https://publicservice.vermont.gov/sites/dps/files/documents/2022VermontComprehensiveEnergyPlan_0.pdf.

Section 248(b)(10): Impact on Vermont Utilities or Customers

Q31. Can the Project be served economically by existing or planned transmission facilities?

A31. Yes. The Project will be served from the new GMP Fair Haven substation approved in Case No. 25-0593-PET. The Project's interconnection does not require any upgrades to the approved substation design, and the Project will pay for the conductor upgrades and monthly SCADA costs described in the Feasibility Study that are its responsibility. See Exhibit PET-GM-4.

Rules 5.403(A)(14) & 5.900: Decommissioning

Q32. What is the plan for decommissioning the facility?

A32. The Project will be decommissioned when it ceases operations permanently and the site will be restored to its condition prior to installation of the facility to the greatest extent practicable. The decommissioning plan includes a special provision to address the potential presence of two rare, threatened, or endangered snake species discussed in the Prefiled Testimony of Adam Crary and Exhibit PET-AC-2. A decommissioning plan and cost estimate are offered with my testimony as Exhibit PET-GM-7. The cost estimate was prepared by Seth Goddard of Krebs and Lansing in compliance with the requirements of Commission Rule 5.904(B)(1). See the Prefiled Testimony of Seth Goddard at 8. The Project's decommissioning commitment will be secured by an irrevocable standby letter of credit or other

1 financial security allowed by Rule 5.904(B)(2)(3) and (4) and approved by the
2 Commission. A sample irrevocable standby letter of credit compliant with the
3 Commission's requirements is included with the cost estimate in Exhibit PET-GM-7.

4 **Conclusion and Declaration**

5 Q33. Does this conclude your testimony?

6 A33. Yes.

7 DECLARATION OF GEOFF MARTIN

8 I declare that the testimony and exhibits that I have sponsored are true and
9 accurate to the best of my knowledge and belief and were prepared by me or under my
10 direct supervision. I understand that if the above statement is false, I may be subject to
11 sanctions by the Commission pursuant to 30 V.S.A. § 30.

12 /s/ Geoff Martin
13 Geoff Martin