

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 SETH D. GODDARD

Summary of testimony: 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.

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**EXHIBIT LIST**

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| Exhibit PET-SDG-1 | Goddard Resume                                                                                                                          |
| Exhibit PET-SDG-2 | Site Plan, EPSC Plan & Details, PAS Testing Requirements, and Secondary Oil Containment Details (Sheets C-100 to C-101, C-105 to C-107) |
| Exhibit PET-SDG-3 | Elevation Drawings (Sheets C-102 and C-103)                                                                                             |
| Exhibit PET-SDG-4 | Sound Study                                                                                                                             |

**Introduction and Qualifications**

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

A1. My name is Seth Goddard. I am Vice President of Krebs and Lansing Consulting Engineers, Inc. (K&L), State of Vermont Professional Engineer #55582. My business address is 164 Main Street, Suite 201, Colchester, VT 05446.

Q2. Please describe your educational background and professional experience.

A2. After receiving my BS in civil engineering from the University of Vermont in 2005, I joined Krebs and Lansing consulting engineers, Inc. where I have worked as an engineer. In 2014, I became an owner of the firm. In my present position I continue to perform extensive work in civil engineering design permitting and construction services for commercial industrial institutional and residential construction projects. I have performed civil site design and related work for utility projects and several other photovoltaic electric generation systems located in Vermont. A more detailed description of my experience is provided in my resume which is offered with my testimony as Exhibit PET-SDG-1.

**Purpose of Testimony**

Q3. What is the purpose of your testimony?

A3. My testimony presents the civil site plan set and sound study that I prepared for Airport RD1 VT Solar, LLC in connection with its petition for a certificate of public good (CPG). I explain why the Airport RD1 VT Solar Project will not have an undue

1 adverse impact on the natural environment with due consideration given to soil  
2 erosion and primary agricultural soils as required by 30 V.S.A. § 248(b)(5) and 10  
3 V.S.A. § 6086(a)(4) & (9)(K). I also provide information on the decommissioning cost  
4 estimate included with the Project's Decommissioning Plan offered with the  
5 Prefiled Testimony of Geoff Martin as Exhibit PET-GM-7.

6 **Exhibit Identification**

7 Q4. Please identify Exhibit PET-SDG-2 and its components.

8 A4. Exhibit PET-SDG-2 is the site plan set consisting of five (5) sheets that I prepared for  
9 the Project. Sheet C-100 provides an orthophoto overlaid with the overall Project  
10 plan and shows the Project's location relative to Airport Road to the west and Route  
11 4 to the south. Sheet C-100 also shows areas where vegetation will be cleared,  
12 vegetation will be managed, and the location of aesthetic mitigation plantings.  
13 Sheet C-101 is the site plan that provides further details of the Project site's existing  
14 conditions, proposed improvements, setbacks, and impact calculations. It shows  
15 the location and type of primary agricultural soils and details of the wetland  
16 crossing needed for access to the southern array section. Sheet C-104 provides the  
17 erosion prevention and sediment control (EPSC) plan and notes related to  
18 preservation of primary agricultural soils that will be disturbed in connection with  
19 the Project's site preparation and construction. Sheets C-105 and C-106 provide  
20 details of the EPSC plan. Finally, Sheet C-107 sets out some of the stormwater

1 management details, secondary oil containment plan and details, details of the  
2 snake exclusion fence and trench escape ramp, and the requirements for pre- and  
3 post-construction soil compaction testing for impacted primary agricultural soils.

4 Q5. Please identify Exhibit PET-SDG-3

5 A5. Exhibit PET-SDG-3 is a two-sheet set (Sheets C-102 and C-103) comprised of the  
6 Project's elevation drawings at a scale of 1"/20' as required by Commission rules.

7 Q6. Please identify Exhibit PET-SDG-4.

8 A6. Exhibit PET-SDG-4 is the sound study prepared by Krebs and Lansing under my  
9 direct supervision. It shows the maximum projected sound power levels from the  
10 Project's sound emitting equipment (inverters and transformers) at certain  
11 receptors during daytime and nighttime hours without accounting for sound  
12 attenuation from background noise, vegetation, and structures. The study shows  
13 the maximum sound power level at nearby residences during the daytime when the  
14 Project produces electricity ranges from 25.9 dBA to 32.4 dBA. This decibel range is  
15 within the range of sound typically experienced in very quiet settings like a library.  
16 Nighttime sound emissions range from 8.8 dBA to 15.8 dBA, a range that is  
17 characterized as barely audible to quieter than a broadcasting studio.

**Ground Disturbance, Vegetation Clearing, and Impact to Primary Agricultural Soils**

Q7. Please explain how much ground disturbance, vegetation clearing, and impact to primary agricultural soils are involved with the Project's site preparation and construction.

A7. Ground disturbance associated with the Project's site preparation and construction will involve approximately 23.02± acres. It includes disturbance from widening, grading, and extension of the existing access road; installation of the array racking and fence posts; stumping and grubbing areas where vegetation will be cleared; installation of new power poles, underground power, equipment pads for the project transformers and electrical equipment; and driving vehicles and equipment. Approximately 4.30± acres of vegetation will be cleared, stumped and grubbed. With respect to primary agricultural soils or "PAS" approximately 5.37 acres of PAS will be impacted from excavation needed for the access road, underground power, equipment pads, and vegetation clearing. To prevent shading during the Project's operations, approximately 2.32± acres of vegetation outside of the project fence line will be managed by mowing or sheep grazing. The impacted areas are shown on the Site Plan, Exhibit PET-SDG-2.

Q8. How did you calculate the acreage of PAS within the limit of disturbance?

A8. The PAS acreage shown within the limit of disturbance on the Site Plan is comprised of mapped PAS and areas that are not mapped as PAS but have been recently used

1 for agriculture. This is consistent with the comments from the Agency of Agriculture,  
2 Food & Markets (AAFM) in response to the 45-day advance notice.

3 Q9. How will the Project handle disturbed PAS to ensure no undue adverse impact to  
4 the natural environment under 30 V.S.A § 248(b)(5)?

5 A9. Consistent with the conditions requested by AAFM and adopted by the Project in  
6 Exhibit PET-GM-3, all excavated PAS for the access road and equipment pads will  
7 be stockpiled within the Project's perimeter fence as shown on the Site Plan, Exhibit  
8 PET-SDG-2, Sheets C-101 and C-104. In addition, all excavated PAS that is not  
9 returned in place in connection with installing underground power will also be  
10 stockpiled within the Project's perimeter fence. At Project decommissioning, these  
11 soils will be restored to the site in accordance with the AAFM's guidelines. As the  
12 soils will be maintained on site and returned at the end of the Project lifetime, there  
13 will be no permanent impacts to PAS and no undue adverse impacts to these soils.  
14 Pre-construction and pre-decommissioning soil compaction testing will be  
15 conducted as required by the AAFM conditions. See Exhibits PET-GM-3 and PET-  
16 SDG-2, Sheet C-107.

17 **Soil Erosion**

18 Q10. How will the Project ensure that site preparation and construction do not cause  
19 unreasonable soil erosion or reduce the capacity of the land to hold water so that a  
20 dangerous or unhealthy condition may result?

1 A10. Site preparation and construction will be performed using appropriate erosion  
2 prevention and control measures (EPSC) as shown on Exhibit PET-SDG-2, Sheets C-  
3 104 through C-106. The Project will follow the requirements of the Department of  
4 Environmental Conservation's Standards and Specifications for Erosion Prevention  
5 and Sediment Control (June 2025). The Project will apply for a moderate risk or  
6 individual construction stormwater discharge permit prior to site preparation and  
7 construction and will comply with the requirements of such permit. By  
8 implementing appropriate EPSC measures and following the guidance and  
9 requirements of the June 2025 Standards and Specifications and stormwater  
10 permit, the Project will not cause an undue adverse impact to the natural  
11 environment due to soil erosion.

12 Q11. Will the Project require an operational stormwater discharge permit?

13 A11. No, it will not. The total amount of impervious surface area after construction will  
14 be less than one acre (0.49± acres) and below the threshold that triggers need for  
15 such a permit.

16 **Secondary Oil Containment**

17 Q12. Please describe the secondary oil containment system for the Project's two  
18 transformers.

19 A12. As the question indicates, there will be two 2,500 kVA transformers, one for each  
20 array section. Each transformer will contain approximately 530 gallons of

1 transformer oil and will be installed on a 26-foot by 12-foot concrete pad. The pad  
2 will have a polyvinyl impervious barrier fixed to its four sides and a 34-foot by 20-  
3 foot containment area filled with stone surrounding it. There will be a four-inch  
4 underdrain around the containment area. The system is designed to contain 110%  
5 of the transformer oil (583 gallons) plus 5 inches of freeboard. See Exhibit PET-SDG-  
6 2, Sheet C-107 for the secondary containment system's design and details. The  
7 secondary containment system will help prevent the inadvertent or accidental  
8 release of transformer oil into the environment, particularly in the wetland and  
9 wetland buffer areas, and will help to ensure that the Project does not have an  
10 undue adverse impact on the natural environment.

11 **Wetland Crossing**

12 Q13. Please describe the design of the wetland crossing between the northern and  
13 southern array sections.

14 A13. The wetland crossing location was selected to minimize impacts to both the  
15 wetland and its buffer. The 12-foot-wide access road, with 1-foot grass shoulders, is  
16 designed with two short 14% centerline grades at either end of the crossing and a  
17 level middle section centered over the culvert. Side slopes of 2H:1V are proposed to  
18 further limit disturbance within the wetland and buffer. A 48-inch culvert will be  
19 installed at the approximate center of the existing drainage and is sized to safely  
20 convey the 100-year storm event.

**Decommissioning Cost Estimate**

Q14. Please explain your experience in preparing decommissioning cost estimates for solar projects like the Airport RD1 VT Solar Project.

A14. I have experience preparing decommissioning cost estimates for multiple utility-scale solar projects reviewed under 30 V.S.A. § 248, including Novus 242 Solar (Case No. 26-0261-PET), Savage Solar Energy LLC (Case No. 26-0540-PET), and Kearsarge PV Orleans LLC (Case No. 24-0039-PET). I have also prepared decommissioning estimates for Encore Renewable Energy's Global Foundries portfolio, including Projects C, G, and H.

Q15. Please explain how you prepared the decommissioning cost estimate that is included in Exhibit PET-GM-7.

A15. The decommissioning estimate was developed using the standardized unit-cost methodology published by the New York State Energy Research and Development Authority (NYSERDA), with adjustments applied to reflect Vermont labor rates and site-specific conditions. This methodology has been consistently accepted by the Vermont Public Utility Commission in numerous solar proceedings and provides a transparent and reliable basis for estimating decommissioning costs.

**Conclusion and Declaration**

Q16. Does this conclude your testimony?

A16. Yes.

DECLARATION OF SETH D. GODDARD

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

/s/Seth D. Goddard  
Seth D. Goddard