

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-2356-PET

Williston G Katie Lane Solar, LLC's Petition
for a Certificate of Public Good in accordance
with 30 V.S.A. § 248 regarding a proposed 2.9
MW ground-mounted solar array located off
Mountain View Road in Williston, Vermont.

**FIRST SUPPLEMENTAL PREFILED TESTIMONY AND DECLARATION OF
ADAM CRARY
ON BEHALF OF
WILLISTON G KATIE LANE SOLAR, LLC**
This document and associated exhibits have been filed ePUC

Summary of Testimony

Mr. Crary's testimony introduces a supplemental natural resources assessment map, Exhibit WGKL-AC-3, covering the area involved in the distribution line upgrade Green Mountain Power (GMP) will conduct to support the Project's interconnection. The map reflects GMP's updated design for the line upgrade and supports the proposed Certificate of Public Good conditions reflected in Petitioner's Memorandum of Understanding with the Vermont Agency of Natural Resources (ANR).

EXHIBITS

Exhibit WGKL-AC-3	Natural Resources Map GMP 19G3 Distribution Line Upgrade
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**FIRST SUPPLEMENTAL PREFILED TESTIMONY OF
ADAM CRARY
ON BEHALF OF
WILLISTON G KATIE LANE SOLAR, LLC**

1 **Introduction**

2 Q1. Please state your name, current employer, business address, and position.

3 A1. My name is Adam Crary, employed at Vanasse Hangen Brustlin, Inc. (VHB), and my
4 business address is 20 Winooski Falls Way, Suite 400B, Winooski, Vermont. I am
5 currently VHB's Regulatory Team Leader, Renewables in Vermont.

6

7 Q2. Have you testified previously in this case?

8 A2. Yes. As a natural resources expert, I submitted prefiled testimony with the Petitioner's
9 original filing in this case.

10

1 Q3. What is the purpose of your supplemental testimony?

2 A3. My supplemental testimony supports the introduction of a supplemental natural resources
3 assessment map, Exhibit WGKL-AC-3, covering the area involved in the distribution line
4 upgrade GMP will conduct to support the Project's interconnection.

5
6 Q4. Please explain the origin and subject matter of Exhibit WGKL-AC-3.

7 A4. Following the filing of the petition in this case, VHB learned that upgrades made by GMP
8 as part of a separate project to their 19G3 Distribution Line, observed during VHB's pre-
9 filing site investigations, included some, but not all, those necessary to support the Project's
10 interconnection. Through additional communication with GMP, VHB's team was able to
11 conclude that the completed upgrades, undertaken for reasons unrelated to the Project, did
12 not include an approximately 1,400-foot segment (as well as a new upgraded regulator
13 bank) of the distribution line for which upgrades will still be required to interconnect the
14 Project. Further communications with GMP enabled VHB to understand the configuration
15 of those remaining Project-related upgrades relative to natural resources in that area.
16 Utilizing this updated information, VHB finished additional natural resources field or
17 database assessments covering a study area running along the distribution line upgrade
18 segment, encompassing approximately 2,070-feet of the existing line. The results of that
19 assessment are depicted in a supplemental "Natural Resources Map- GMP 19G3
20 Distribution Line Upgrade."

1 Petitioner provided this map to ANR during discovery. The map informed MOU
2 negotiations between Petitioner and ANR regarding proposed CPG conditions, including
3 those proposed in Exhibit WGKL-ANR-1. The supplemental map is now being submitted
4 as Exhibit WGKL-AC-3.

5
6 Q5. Has the work VHB completed in preparing Exhibit WGKL-AC-3 changed the opinions on
7 the Project's compliance with Section 248 criteria that you offered in your previous
8 testimony?

9 A5. No, my opinion that the Project, upon receipt of all required permits, can be constructed as
10 designed with no undue adverse impact to the natural environment through the criteria that
11 I reviewed, is unchanged.

12
13 Q6. Does this conclude your testimony?

14 A6. Yes.

WITNESS DECLARATION

I, Adam Crary, being over 18 years of age, and competent to testify on these matters declare that on behalf of Petitioner, I prepared my first supplemental prefiled testimony and exhibits in the above captioned matter and I have the necessary expertise to testify to the same information. I declare that my testimony and exhibits are true and accurate to the best of my knowledge and belief. I understand that if such responses are false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Monkton, Vermont, this 28th day of April, 2026.

/s/ Adam Crary

Adam Crary