

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Novus Buck Solar LLC for a
Certificate of Public Good, pursuant to 30
V.S.A. § 248, authorizing the installation and
operation for a 4.999 MW ground-mounted
solar array in Newport Town, Vermont to be
known as the “Novus Buck Solar Project”

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) Case No. 26-____-PET
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PREFILED TESTIMONY OF T. ALEX BRAVAKIS

May 7, 2026

Summary: Mr. Bravakis provides an overview of the proposed Buck Solar Project, including the Project’s compliance with the following Section 248 Criteria: need for the project; system stability and reliability; economic benefits, public health and safety; use of natural resources; greenhouse gas impacts; transportation systems; municipal services; educational services; historic sites; development affecting public investments; integrated resource plan; compliance with electrical energy plan; existing or planned transmission facilities; setbacks; and decommissioning plan and fund (Public Utility Commission Rule 5.900).

EXHIBIT LIST

NBS-AB-1: Resume of Alex Bravakis
NBS-AB-2: Site Plans and Cross-Sections
NBS-AB-3: Representative Equipment Specifications
NBS-AB-4: One Line Diagram
NBS-AB-5: Decommissioning Plan
NBS-AB-6: VEC Letter to Interested Parties

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

2 A1. My name is T. Alex Bravakis and I am the managing member of Novus Energy
3 Development, LLC (“NED”), a firm specializing in the development of solar projects in
4 Vermont and the sole member of Novus Buck Solar LLC (“Petitioner” or “Novus
5 Buck”). Our business is located at 250 Main Street in Montpelier, Vermont. I am
6 assisting Novus Buck with development of this project.

7
8 **Q2. What is the purpose of your testimony?**

9 A2. My testimony supports Novus Buck’s petition for a Certificate of Public Good to
10 construct and operate a 4.999 MW AC solar electric generation project (“Project”) on a
11 former gravel pit located off Vermont Route 100 in Newport Town, Vermont.
12 Specifically, my testimony provides an overview of the Project and describes the
13 Project’s compliance with certain Section 248(b) criteria as required under Commission
14 Rule 5.400.

15
16 **Q3. Please describe your professional background, qualifications, and experience.**

17 A3. For over a decade, I have been involved with the development of renewable energy and
18 combined heat and power projects, primarily in New England and California. As a
19 member of project teams, I have been mainly responsible for project identification and
20 coordination of all activities related to obtaining the contracts, permits, and agreements
21 needed for project financing. As a managing member of NED, I coordinate all of the

1 major project development activities of our “pipeline” projects as well as identify and
2 analyze new opportunities. I also have an understanding of current renewable energy
3 policies and work to keep the team informed about existing and proposed changes to
4 legislation that may impact the projects that we have under development. This
5 experience has given me practical knowledge with respect to how projects transition from
6 concept through construction. My resume is attached as *Exhibit NBS-AB-1*.

7
8 **Q4. Have you previously testified before the Public Utility Commission?**

9 A4. Yes, I have provided prefiled testimony on behalf of a number of solar facility projects
10 developed by NED.

11
12 **Project Description & Overview**

13 **Q5. Please provide an overview of the Project.**

14 The Project is a 4.999 MW AC solar electric generation facility to be located on a portion
15 of leased land on the parcel owned by Couture Sand and Gravel off of Buck Road and
16 Route 100 in Newport Town, Vermont (the “Site”). The Site was previously used as a
17 gravel pit, and the fenced-in Project area will utilize the previously disturbed portions of
18 the Site.

19 The Project is located approximately 320-ft from Vermont Route 100, the closest
20 traveled way, and about 229-ft to the nearest offsite residence. The Project will occupy a
21 fenced-in area of approximately 17.63 acres. No vegetative clearing is proposed for the

1 Project. The Project will be accessed through a new 12-foot wide gravel access drive off
2 Buck Road leading into the Project Site. See Site Plan (*Exhibit NBS-AB-2*).

3 The Project is bordered to the west by Route 100. The parcels surrounding the
4 Project site contain buildings and equipment related to the gravel pit operation, dispersed
5 residential dwellings, a cemetery, and forested areas. See *Exhibit NBS-AB-2*.

6
7 **Q6. Please describe the design and equipment for the Project.**

8 A6. The Project will be comprised of approximately 30 rows of solar panels running east to
9 west. The panels will be mounted on fixed tilt racking, which will reach a maximum
10 height of approximately 11 feet at the highest point. On-site electrical equipment will
11 include 24 inverters, rated at 250 kW each located on inverter racks, and alternating
12 current (“AC”) collector system components consisting of underground conduit, wire,
13 AC combiner panel boards, AC switchgear, and AC power zone for service to the PV
14 system auxiliary equipment. Two pad-mounted 2,500 kVA transformers with secondary
15 containment systems will be located next to the inverter racks at the center of the Project.
16 The inverters will be surrounded by an 8’ fence wrapped with sound attenuation blankets.

17 Power will run underground from the transformers to midway down the access
18 road, where the line will transition to overhead. The power will then run above-ground
19 on approximately five new utility power poles to the point of interconnection at an
20 existing Vermont Electric Cooperative (“VEC”) power pole on Buck Road. See *Exhibit*
21 *NBS-AB-2*.

22 The entire solar field will be surrounded by a perimeter fence consisting of a
23 fixed-knot, wire-style fence at least 7’ high with openings of no smaller than 6” x 6”.

1 The fencing will be secured (meeting National Electric Code requirements) to prevent
2 unauthorized access to the electrical equipment and will be kept close to ground level to
3 avoid access by large wildlife. See ***Exhibit NBS-AB-2***. Specification sheets and cut
4 sheets of representative solar panels and inverters are attached to my testimony as
5 ***Exhibit NBS-AB-3*** and a one-line diagram of the proposed system design is included in
6 ***Exhibit NBS-AB-4***. The final selection of specific equipment and manufacturers will be
7 made after the CPG is obtained, depending upon market availability and engineering,
8 procurement, and construction contractor specifications. Novus Buck expects that the
9 final equipment will be materially the same as what is described in this Petition in terms
10 of overall output and performance.
11

12 **Q7. Will the Project conform to applicable electrical, safety, power quality, and**
13 **interconnection requirements established by the National Electrical Code, the**
14 **Institute of Electrical and Electronic Engineers, and Underwriters Laboratories?**

15 A7. Yes. The system will be designed to meet the applicable requirements set forth in the
16 National Electrical Safety Code, National Electrical Code, the Institute of Electrical and
17 Electronic Engineers, and Underwriters Laboratories as they relate to electrical
18 compliance and safety, power quality, and interconnection.
19

20 **Q8. Will the Project enter into an interconnection agreement with VEC for the facility?**

21 A8. Yes. Novus Buck will enter into an interconnection agreement with VEC prior to
22 operation of the Project.

Q9. Please state the Project's capacity and anticipated energy production.

A9. The nameplate capacity of the Project will be 4.999 MW (AC), with an installed DC wattage of approximately 8,142 MW (DC). The Project is expected to produce a net energy output (after DC to AC conversion) of approximately 9,500 MWh per year.

Q10. How will the site be accessed during construction and operation of the Project?

A10. The Project site will be accessed via the new proposed access drive off Buck Road, which previously served the gravel pit operation.

Q11. Please discuss the anticipated Project construction activities and schedule.

A11. Construction of the Project is expected to take several months following receipt of the necessary approvals depending on weather and other logistical constraints. The first phase of construction will be to conduct site preparation work as needed. The second phase of construction will involve the installation of the steel racking, frames, solar panels, and inverters. During this phase, VEC will install the overhead power lines, new poles, and pad-mounted transformer. The final phase of construction will involve securing the solar modules, wiring the inverters, installing the data acquisition system, installing the perimeter fence, and constructing the gravel access drive. Following completion of these activities, the system will be tested and commissioned for continuous operation. All installation activities and related deliveries will occur between 7:00 AM and 7:00 PM Monday through Friday, and on Saturdays between 8:00 AM and 5:00 PM

1 if required to meet the Project Schedule. No installation activities or deliveries will occur
2 on Sundays or on state or federal holidays.

3
4 **Q12. Please discuss the operation and maintenance activities for the Project.**

5 A12. The system will be monitored remotely in real time, with an online system. The system
6 will inform management about, for example, a sudden drop in power output, or an
7 unusual output amount from one series of modules to the next. Site visits will be
8 conducted on an as-needed basis. A long-term operations and maintenance contract will
9 be in place with a maintenance company that will be responsible for keeping the system
10 operating properly and for keeping the site mowed and the access road maintained.

11
12 **Q13. Has the Petitioner provided 45-day notice to the entities listed in Commission Rule**
13 **5.402(A)?**

14 A13. Yes, Novus Buck sent out a 45-Day Notice on December 10, 2025 describing the Project.
15 A copy of the 45-Day Notice, including a full list of notified parties, was filed on ePUC
16 and assigned Case No. 25-3051-AN.

17
18 **Q14. Has the Petitioner received any comments in response to the 45-day notice?**

19 A14. Yes, Novus Buck received some feedback from the Agency of Agriculture, Food and
20 Markets (“AAFM”). AAFM requested that the site plan delineate the Primary
21 Agricultural Soils (“PAS”) and proposed soil stockpile locations and to confirm whether
22 the gravel pit operation was subject to an Act 250 permit with PAS-related conditions.

1 AAFM also proposed standard CPG conditions related to PAS. The site plan shows the
2 presence of mapped PAS, however, no PAS stockpiles are currently proposed given there
3 will be no excavation of mapped PAS. See *Exhibit NBS-AB-2*. It is my understanding
4 after speaking with the gravel pit owner as well as the Act 250 District Coordinator, that
5 the gravel pit operation predates Act 250 and that there is no Act 250 permit for the
6 operation. The Project's potential impacts on PAS and compliance with this Section 248
7 criteria is addressed further in the testimony of Seth Goddard.

8 Novus Buck has not received any questions about the Project from any adjoining
9 landowner, Town, or Regional Planning Commission during the 45-day Advance Notice
10 period.

11
12 **Q15. Please identify who will pay for the Project's costs of interconnection.**

13 A15. The Project will be responsible for any costs to interconnect the Project to VEC's system,
14 including any upgrades identified in the interconnection review conducted by VEC as
15 discussed further below.

16
17 **Q16. Will the site be reclaimed prior to construction or operation of the Project?**

18 A16. Yes. Prior to construction of the Project, the site will be reclaimed and will be graded to
19 a consistent slope. However, seeding and mulch stabilization will be temporary if
20 reclamation occurs within two months of Project construction, with final seeding and
21 mulch to occur after Project construction to avoid re-disturbance of these stabilization
22 measures during construction.

1
2 **Q17. Will Petitioner register all underground lines owned by the Project with DigSafe?**

3 A17. Yes, Petitioner will register all underground lines that are owned by the Project that are
4 outside the Project fence line with DigSafe and will comply with the rules of DigSafe for
5 the life of the Project.
6

7 **Q18. What are the plans for the site when the Project reaches the end of its useful life?**

8 A18. As described in the Project's decommissioning plan, attached to my testimony as *Exhibit*
9 *NBS-AB-5*, at the end of the Project's useful life, the Project equipment will be removed
10 from the site and sold, recycled, or disposed of in accordance with applicable waste
11 regulations. An estimate of decommissioning costs of \$174,483 is included in the
12 decommissioning plan. Petitioner will obtain a letter of credit or other approved
13 alternative security for this amount as a decommissioning fund, to be approved by the
14 Commission prior to beginning site preparation or construction of the Project as set forth
15 in the decommissioning plan. See *Exhibit NBS-AB-5*.
16

17 **SECTION 248 CRITERIA**

18 **30 V.S.A. § 248(b)(1) – Orderly Development of the Region**

19
20 **Q19. Will the Project unduly interfere with the orderly development of the region?**

21 A19. No. The Project will not unduly interfere with the orderly development of the region
22 with due consideration having been given to the recommendations of the Town Planning
23 Commission and Selectboard, as well as any applicable land conservation measures in the

1 Town Plan and Regional Plans and substantial deference having been given to any
2 applicable land conservation measures and specific policies contained in the Regional
3 enhanced energy plan. Further detail is provided in the report provided by Michael
4 Willard, *Exhibit NBS-MW-2*, including relevant excerpts of the Town and Regional
5 plans.

6
7 **30 V.S.A. § 248(b)(1)(B) – Municipal Screening Requirements**

8 **Q20. Are there any municipal screening ordinances or bylaws for solar facilities that**
9 **would apply to the Project? If so, does the Project comply with applicable screening**
10 **ordinances or bylaws?**

11 A20. Novus Buck has searched the Town of Newport website and the Town Zoning Bylaws
12 (2018) and has not found any solar screening ordinance or bylaw.

13
14 **30 V.S.A. § 248(b)(2) – Need for the Project**

15 **Q21. Is the Project required to meet the need for present and future demand for service**
16 **under Section 248(b)(2)?**

17 A21. Yes. The Project will help VEC to secure locally generated renewable energy through a
18 long-term PPA to help meet VEC's obligations under the Vermont RES and to take
19 advantage of expiring tax credits. Novus Buck and VEC have entered into a PPA for the
20 Project, which was submitted to the Commission on November 19, 2025 pursuant to

1 Commission Rule 5.202.¹ VEC also sent a letter to the Town and the adjoining
2 landowners to the Project to explain VEC's role in the Project and interest in securing
3 cost-effective, locally generated renewable energy at appropriately sited locations. See
4 *Exh. NBS-AB-6*. The Project is expected to be able to qualify for these federal
5 investment tax credits that are ending, which will help reduce costs for VEC ratepayers.
6 Thus, the Project is needed to help VEC meet its obligations and supply its customers
7 with cost-effective power.

8
9 **30 V.S.A. § 248(b)(3) – System Stability and Reliability**

10 **Q22. Please describe the status of the Project's interconnection review by the**
11 **interconnecting utility.**

12 A22. In accordance with Rule 5.500, Petitioner submitted an interconnection application to
13 VEC on November 25, 2025. The Project design (see One-Line Diagram, *Exhibit NBS-*
14 *AB-4*) is currently in the process of interconnection review by VEC in a System Impact
15 Study ("SIS"). A preliminary screening has been completed by VEC, which identified
16 several screening criteria on which the Project required further study to assess the
17 Project's impacts. The SIS is actively underway and will identify the scope of mitigation
18 or upgrades that are required to address the issues identified in the preliminary screening.

19 While Petitioner understands that the Commission generally does not deem a
20 petition complete until an SIS has been completed, Petitioner is asking the Commission
21 for a waiver of this requirement in order to commence this proceeding while the SIS is

¹ See Case No. 25-2883-PPA. Waiver of the 90-day notice period was granted by the Commission on December 26, 2025.

1 still in progress due to unique circumstances of the timing constraints for qualification of
2 federal tax credits (explained above), which is entirely outside of Petitioner’s control.²
3 Petitioner is actively working with VEC towards the development of this Project in order
4 to secure VEC additional supply of locally-generated renewable energy that includes
5 federal tax credit benefits. As noted in the waiver, waiting until the SIS is complete prior
6 to submitting this Petition could jeopardize the start of this Project’s construction, since
7 the timing of the SIS is entirely outside of Petitioner’s control. Petitioner expects the SIS
8 to be completed in the coming weeks and will file the results as soon as the study is
9 issued. VEC is currently estimating that the SIS will be issued in early May.

10
11 **Q23. Does Petitioner have any reason to expect there will be any material issues identified**
12 **in the SIS with interconnection of the Project that could result in any undue adverse**
13 **impacts on system stability or reliability?**

14 A23. No. The preliminary screening for the Project identified a few issues with the originally
15 proposed point of interconnection (“POI”) and how the Project may affect VEC’s
16 substation transformer. However, after consultation from VEC, the interconnection
17 design was modified to address these concerns by revising the POI and the substation
18 transformer impacts will be studied further under the SIS. Petitioner has discussed the
19 current Project design with VEC with respect to potential issues with interconnection,
20 and understands from VEC that at a preliminary level they do not anticipate the SIS to
21 identify any major concerns with the Project interconnection based on capacity at the

² See Request for Waiver.

1 interconnecting substation under the current interconnection design. The only
2 interconnection upgrade that VEC has identified as a known update is the line between
3 the POI on Buck Road and Route 100 as needing to be upgraded from single-phase to
4 three-phase line (approximately 0.25 miles). No natural resources were identified by
5 Petitioner's consultant in this area that would be potentially impacted by this upgrade
6 work. See *Exhibit NBS-DB-2*. The SIS will provide a more in-depth review of any
7 interconnection impacts and will identify the specific upgrades or mitigation measures
8 that are required. Petitioner does not anticipate that this will include any major upgrades
9 to distribution lines beyond the Project site. If such upgrades were required, Petitioner
10 will review and address any potential for substantial impacts on any Section 248 criteria
11 resources in a supplemental filing.

12
13 **Q24. Is there any other interconnection review in progress for the Project?**

14 A24. Yes. While projects 5 MW or less in size are not generally subject to ISO-New England
15 interconnection requirements, the Project is included in a cluster study review by ISO-NE
16 of many smaller distribution level generation facilities. This study is anticipated to be
17 completed by late June or early July of 2026. Petitioner has discussed this with VEC and
18 understands from VEC they do not expect there to be any adverse impacts identified by
19 ISO-NE due to the Project's interconnection to the distribution level system.

20

1 **Q25. Who will pay for any system upgrades that may be required to interconnect the**
2 **Project?**

3 A25. Petitioner will be responsible for paying for any upgrades that are required in order to
4 interconnect the Project. These upgrades will be completed prior to operation of the
5 Project.

6
7 **Q26. Will the Project enter into an interconnection agreement with VEC?**

8 A26. Yes, prior to operation of the Project, Petitioner will enter into an interconnection
9 agreement with VEC.

10
11 **Q27. Will the Project adversely affect system stability and reliability?**

12 A27. No, the Project will not adversely affect system stability and reliability. The Project will
13 not move forward unless the SIS shows that the Project can interconnect to VEC's
14 distribution system without adverse impacts to system stability or reliability, which it is
15 expected to do. Petitioner will file the results of the SIS as soon as it is available, and
16 will pay for any necessary upgrades identified in the SIS, which will be completed prior
17 to interconnection. Petitioner will address any potential impacts on natural resources as a
18 result of any necessary upgrades, which are not anticipated at this time, in a supplemental
19 filing if necessary. These steps will ensure that the Project will not result in any undue
20 adverse impacts on system stability and reliability.

30 V.S.A. § 248(b)(4) – Economic Benefit

Q28. Will the Project result in economic benefits for the State and its residents? If so, please describe.

A28. Yes. As noted above, Petitioner is working with VEC to try to develop this Project in time to take advantage of federal tax credits that will help VEC add another long-term cost-stabilized generation resource to its portfolio before the economic benefits of the tax credits expire. See *Exhibit NBS-AB-6*. The Project will provide economic benefits to VEC customers in that the PPA price for this Project is anticipated to be lower than future projects that cannot obtain the credits that help lower the overall cost of developing the Project. In addition, the Project will provide economic benefits through lease payments to the landowner and through new municipal and state tax benefits. Based on the Uniform Capacity Tax Rate of \$4.00/kW of plant capacity, the Project would pay approximately \$19,996 in state taxes each year of the Project's life (\$4.00 x 4,999 kW), which over a lifetime of twenty-five years would amount to just under \$500,000 in state taxes. The Project will also pay municipal property taxes to the Town of Newport. In addition, Petitioner will hire Vermont-based contractors and consultants for the Project where possible, including for engineering design, legal work, environmental and aesthetics review, and construction-related work. Each of these aspects of the Project will provide an economic benefit for the State or its residents.

As part of the PPA with VEC, Petitioner has also addressed the potential for any adverse economic impacts from the Project's location within the Sheffield Highgate Export Interface ("SHEI"). The PPA includes a "SHEI Transmission Fee" of

1 \$12.55/kWac to be paid by Petitioner to VEC as part of the interconnection costs for the
2 Project. This mitigation fee is consistent with the mitigation fee that has been approved
3 for other recent solar facilities. With this fee, the Project will offset any adverse
4 economic impacts from any transmission constraints resulting from the Project's location.
5 As the Project will offset any potential costs (which even if not offset, are far lower than
6 the expected benefits) and will result in an overall economic benefit for the State and its
7 residents.

8
9 **30 V.S.A. § 248(b)(5) – Natural Environment & Use of Natural Resources**

10 **Q29. Has there been an investigation of the Project's potential impacts on the Natural**
11 **Environment and Use of Natural Resources under Section 248(b)(5)?**

12 A29. Yes. The Project's potential impacts on specific natural resources are addressed in the
13 Arrowwood Environmental Report provided by witness Dori Barton as *Exhibit NBS-DB-*
14 2. Based on the results of the natural resources assessment, the Project will not have an
15 undue adverse impact on the use of natural resources or the natural environment under
16 any of the environmental criteria of Section 248(b)(5).

17
18 **10 V.S.A. § 6086(a)(8) – Historic Sites**

19 **Q30. Will the Project have an undue adverse effect on historic sites?**

20 A30. No, the Project will not have an undue adverse impact on either below or above-ground
21 historic resources. There are no above-ground historic buildings on the parcel, and the
22 Project area has been previously disturbed due to the gravel pit operations. With respect
23 to any potential above-ground resources in the surrounding area, to the extent that there is

1 visibility of the Project site, any such resources would currently have an open view of the
2 gravel pit. The Project is proposing some landscape mitigation along Route 100 that will
3 break up visibility into the Project site. See Site Plan, *Exhibit NBS-AB-2*. The Project
4 will therefore not have an undue adverse impact on above or below-ground historic
5 resources.

6
7 **30 V.S.A. § 248(b)(5) – Transportation Systems**

8 **Q31. Will the Project cause unreasonable congestion or unsafe conditions with respect to**
9 **transportation systems?**

10 A31. No. Access to the site will be from Route 100 and Buck Road, which have been used by
11 large vehicles for the gravel extraction operation that has been present on the site for
12 many years. During construction, Petitioner anticipates approximately 40-45(+/-) tractor
13 trailers will deliver modules, racking, and inverters to the site over several weeks.
14 Following construction, the traffic to the site will be less than the extraction operation,
15 and will be limited to maintenance and repair visits a few times a year. Therefore, the
16 Project will not result in any unreasonable congestion or unsafe traffic conditions.

17
18 **30 V.S.A. § 248(b)(5) – Educational Services**

19 **Q32. Will the Project place an unreasonable burden on municipal educational services?**

20 A32. No. The Project will not result in the addition of any new, school-aged children to the
21 municipal school system that would impact the provision of educational services.

22

30 V.S.A. § 248(b)(5) – Municipal Services

Q33. Will the Project place an unreasonable burden on any other municipal services?

A33. No. The Project will not require any municipal water or sewer services, new roadway acceptance or maintenance by the Town of Newport, nor require any unique fire or police services beyond those typically required of other businesses.

30 V.S.A. § 248(b)(5) – Public Health and Safety

Q34. Will the Project have an undue adverse effect on public health and safety?

A34. No. All switchgear equipment will be inside locked UL-listed, code-approved electrical enclosures. Electrical lines that connect the string combiners to the inverters and switch gear enclosure, and from the mounted transformer to the point of interconnection will be located inside underground conduit. The fencing will be posted with appropriate electrical warning signs and/or placards. The fence will be locked and accessible only by Project personnel. As a result, there will be no undue adverse risk that the public, or wildlife, will access the Project equipment.

30 V.S.A Section 248(b)(5) – Greenhouse Gas

Q35. Will the Project result in undue adverse impacts with respect to Greenhouse Gases?

A35. No. The Project will not involve any industrial/manufacturing emissions. The Project will result in a new generation resource that will produce electricity for Vermont without emitting greenhouse gases during operation. Adding renewable energy resources like this Project will help reduce the need for carbon-based sources of electric energy and decrease Vermont's reliance on fossil fuel-based generation sources.

10 V.S.A. § 6086(a)(9)(K) – Development Affecting Public Investments

Q36. Will the Project unnecessarily or unreasonably endanger the public or quasi-public investments in adjacent lands, services, or facilities, or materially jeopardize or interfere with the public’s use and enjoyment of those lands, services, or facilities?

A36. No, it will not. The Project is located on private land previously used as a gravel pit. No public roads or other public resources will be physically impacted by the Project, nor will there be any material increase in traffic on public roads. And, as indicated in the report prepared by Michael Willard, the Project will not have adverse aesthetic impacts. See *Exhibit NBS-MW-2*.

30 V.S.A. § 248(b)(6) – Least Cost Integrated Resource Plan

Q37. Is the Project consistent with the principles for resource selection expressed in an approved least cost integrated plan?

A37. Petitioner is not a retail distribution utility, and as such is not required to have an approved least-cost integrated plan. This criterion is therefore inapplicable, consistent with the Commission’s approach to similar projects.

30 V.S.A. § 248(b)(7) – Vermont Electric Plan

Q38. Is the Project consistent with the 2022 Comprehensive Energy Plan (CEP)?

A38. Yes. The Project will contribute to meeting the state’s long-term renewable energy goals because it is a renewable solar energy project that is located near load. The Project furthers key objectives of the CEP, which calls for meeting state energy goals largely

1 through an increase in renewable resources. Specifically, the CEP includes a goal of
2 meeting 100% of energy needs through carbon-free resources by 2032, with at least 75%
3 from renewable energy. As one of the last projects that may be able to take advantage of
4 the current federal tax credits, this Project will also help further the goals of securing
5 cost-effective and affordable resources and minimizing conversion of natural lands by
6 utilizing a previously disturbed site. In addition, the payment of a SHEI Transmission Fee
7 to VEC as part of the PPA is consistent with the recommendations in the CEP to consider
8 economic mitigation fees in grid constrained areas such as the SHEI.³ For these reasons,
9 the Project is consistent with the CEP.

10
11 **30 V.S.A. § 248(b)(10) – Transmission Facilities**

12 **Q39. Can the Project be served economically by existing or planned transmission**
13 **facilities without an undue adverse effect on Vermont utilities or customers?**

14 A39. Yes, the Project will interconnect to the VEC distribution system and will not
15 interconnect to the transmission system. The SIS in progress will serve to confirm that
16 the Project can interconnect safely to the distribution system and will identify any
17 necessary upgrades that would need to be completed prior to interconnection. Petitioner
18 will pay for any such upgrades to be complete before operating the Project, which will
19 ensure that the Project does not result in any undue adverse impacts on Vermont utilities
20 or customers. Additionally, through the SHEI Transmission Fee included in the PPA
21 with VEC, the Project will pay to offset any potential cost impacts as a result of SHEI

³ See CEP at p. 253, [2022 Vermont Comprehensive Energy Plan](#)

1 constraints from the Project's location, thus ensuring that the Project will not have an
2 adverse economic impact on any existing or planned transmission facilities.

3
4 **30 V.S.A. § 248(s) – Setbacks**

5 **Q40. Does the Project comply with the setback requirements in 30 V.S.A. § 248(s)?**

6 A40. Yes, the Project's solar panels are set back at least 50' from each property boundary and
7 approximately 320 feet from the edge of the nearest municipal highway (Route 100). See
8 *Exhibit NBS-AB-2*.

9
10 **Q41. Does this conclude your testimony at this time?**

11 A41. Yes, it does.