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 AC ground-mounted solar array in Newport Town, Vermont to be known as the "Novus Buck Solar Project"	)	Case No. 26-____-PET

PREFILED TESTIMONY OF SETH GODDARD

May 7, 2026

Summary: Mr. Goddard addresses the Project's compliance with certain Section 248 criteria including: air and water purity, waste disposal, soil erosion, sound, and primary agricultural soils.

Exhibits

NBS-SG-1: Resume of Seth Goddard
NBS-SG-2: Sound Study

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. What is the purpose of your testimony?

A2. My testimony supports the application of Novus Buck Solar LLC ("Novus Buck Solar" or "Petitioner") for a Certificate of Public Good to construct and operate a 4.999 megawatt (AC) solar electric generation project ("Project") located at 50 Buck Road in Newport Town, Vermont. Specifically, my testimony addresses the Project's compatibility with a number of criteria applied by the Vermont Public Utility Commission under Section 248, including air and water purity, waste disposal, soil erosion, sound, and primary agricultural soils.

Q3. Please describe your professional background, qualifications, and experience.

A3. 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 ***Exhibit NBS-SG-1***.

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

A4. Yes, I have provided prefiled testimony on behalf of a number of solar facility projects.

Q5. Please describe the work you have done for this Project.

A5. My review of this Project involved the civil/site engineering design. I have performed the following tasks and evaluations:

1. Survey of site features.
2. Design of the site plans, which included: shading analysis, array layout, access road, erosion prevention and sediment control measures, and fencing.
3. Review of operational and construction stormwater permitting needs.
4. Study of Project-related sound impacts during operation.
5. Review of primary agricultural soil mapping.

SECTION 248 CRITERIA

Air Pollution – 10 V.S.A. § 6086(a)(1)

Q6. Will the Project cause undue air pollution?

A6. No. Construction of the Project will result in some temporary emissions of minimal levels of air pollutants from construction vehicles on site, similar to any construction project. These emissions will be limited to the times that vehicles are on the site and running and only for the construction period. As this site has been used as a gravel extraction site, the

level of emissions will not be inconsistent with the type of activity on this site previously. During operation of the Project, there will be no emission of air pollutants other than from occasional maintenance vehicles (e.g. mowers). These temporary and infrequent emissions will not result in any undue adverse impact on air pollution.

Q7. Will the Project have an undue adverse effect with respect to sound?

A7. No, it will not. The sound generated by Project construction will be of limited duration, will largely take place during daytime hours, and will be comparable to the sound generated by light construction equipment. Construction activities for the Project will be limited to the hours between 7:00 A.M. and 7:00 P.M., Monday through Friday, and between 8:00 A.M. and 5:00 P.M. on Saturdays, as needed. Construction will not occur on state or federal holidays or Sundays unless authorized by the Commission upon request.

With respect to potential noise impacts during operations, the Project components that will generate sound that may be audible from off-site locations (i.e., beyond the Project parcel) are the two 2,500 kVA transformers and twenty-four (24) string inverters. The transformers will be located near the center of the array. The string inverters will be mounted on an equipment rack located adjacent to the transformers and surrounded by an eight-foot tall fence that is wrapped in sound attenuation blankets that will reduce the sound levels from this equipment by approximately 29 decibels. ***See Exhibit NBS-AB-2***.

Estimates of the expected sound levels from the Project's inverters and transformers were developed using the distance damping equation shown on ***Exhibit***

NBS-SG-2. These estimates are conservative in that I have assumed, for purposes of the daytime sound estimates, that all of the electrical equipment is operating simultaneously and continuously at its maximum sound levels. I have also conservatively assumed the reduction in the estimated sound levels of the inverters from the use of the sound attenuation blankets to be 14.5 decibels instead of the maximum 29 decibels, which is half of the estimated reduction impact. Likewise, I have not accounted for any ambient background noise or the attenuating effect of any vegetation, buildings, or topography located between the sound source and off-site receptors, in particular proposed vegetation between the Project and closest residence.

Even with these conservative assumptions, the estimated sound levels from the Project will be low. The estimated daytime and nighttime Project-related sound levels at the nearest off-site residence are estimated to be approximately 33.6 dBA (daytime), and 18.9 dBA (nighttime). The nighttime sound level was modeled using the transformers only as the inverters do not operate in the absence of sunshine on the panels and will therefore not produce any sound. The calculations and supporting information are provided as ***Exhibit NBS-SG-2***.

These sound levels are generally low and are in the quiet to very quiet range compared to everyday noises in the sound chart in the report. It is my understanding that these sound levels are comparable to other solar projects previously approved by the Commission in that they are below 45 dBA at the nearest residence. Therefore, the Project will not have an undue adverse effect with respect to sound.

Water Pollution – 10 V.S.A. § 6086(a)(1)

Q8. Will the Project result in undue water pollution?

A8. No, for the reasons enumerated under the specific water-related sub-criteria below and those set forth in ***Exhibit NBS-DB-2***.

Waste Disposal – 10 V.S.A. § 6086(a)(1)(B)

Q9. What are the Project's plans for waste disposal?

A9. As there will be no buildings associated with the Project, no on-site wastewater disposal system is required for the Project and thus a Wastewater System and Potable Water Supply Permit is not required.

Any metal or cardboard generated from the Project construction will be recycled. All construction waste that cannot be recycled will be disposed of in an approved sanitary landfill. During operation of the Project, there are no anticipated activities that will generate waste materials requiring disposal.

Project operations will not generate solid wastes, will not involve the injection of waste materials into groundwater or wells, and will not generate sanitary waste or stormwater runoff from new impervious surfaces that would require treatment pursuant to a Vermont Department of Environmental Conservation permit. With respect to stormwater runoff from Project construction or operation, see my testimony below under Soil Erosion.

Within the limits of disturbance for the Project (approximately 19.08 acres), there are approximately 0.51 acres of soil disturbance that will result from grading and earthwork, primarily necessary to construct the access road and equipment pads and

installation of conduit. The finish grades are portrayed on the Project Site Plan in ***Exhibit NBS-AB-2***. The site will be graded to the approximate finish grades shown and reclaimed by the gravel pit owner with seed and mulch prior to the Project construction (seeding will be temporary if reclamation occurs within two months of Project construction, with final seeding to occur after Project construction). The Project site is currently partially a sand and gravel surface and partially a corn field, and there is no overall change to the drainage pattern within the site. No vegetative clearing is proposed. See ***Exhibit NBS-AB-2 at Sheets C-100 and C-103***.

Q10. Will the Project meet any applicable health and environmental regulations regarding the disposal of wastes?

A10. Yes, the Project will comply with any applicable health and environmental conservation department regulations that may apply to the waste disposal activities for the Project described above.

Water Conservation, Sufficiency of Water Supply, and Burden on Existing Water Supply – 10 V.S.A. §§ 6068 (a)(1)(C), (a)(2), (a)(3)

Q11. Please describe any use of water during construction and operation of the Project.

A11. The Project may use a small amount of water during the construction phase if required for dust control and for occasional cleaning of panels during the operational phase. In both instances, any small amount of water needed will be brought to the site. Otherwise, the Project will not utilize any water supplies (on-site or off-site) during construction or operations and will not require connection to a well or municipal water supply.

Q12. Will the Project result in any undue adverse impact on water conservation or sufficiency, or place an undue burden on any existing water supplies?

A12. No. As described above, the Project will not require the use of any water supply and therefore will not have any impact on water conservation, sufficiency, or existing supply.

Soil Erosion – 10 V.S.A. § 6086(a)(4)

Q13. Please discuss whether a construction stormwater permit is needed for the Project.

A13. The Project will include potential soil disturbance of approximately 19.08 acres. The Project will be subject to an Agency of Natural Resources ("ANR") Moderate Risk Construction Stormwater General Permit or Individual Construction Stormwater Permit ("INDC"). If the Project elects to concurrently disturb more than five acres, then an INDC permit will be required. Alternatively, if less than 5 acres of concurrent disturbance will occur, then a Moderate Risk permit will be required. The Project will be constructed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control, June 19, 2025. No work shall commence until the Project receives its Moderate Risk or INDC permit.

The majority of the total potential Project earth disturbance within the limits of disturbance will be from construction traffic. Specific potential earth disturbances from installation of Project infrastructure and equipment will include installation of the at grade access road (±11,375 sq. ft.), installation of electrical equipment pads and associated secondary oil containment (±937 sq. ft.), underground trenching of the

electrical conduit (±10,000 sq. ft.), construction staging areas, concentrated work areas, fencing, and miscellaneous other disturbances for construction vehicle travel and post installation. All areas of construction disturbance, as well as the existing and proposed topography, are shown on the Project's Site Plan and EPSC Plan (Sheets C-100 & C-103), ***Exhibit NBS-AB-2***.

Stormwater runoff and erosion control methods that will be used during construction include: temporary soil stabilization with mulch within 14 days of initial site disturbance, a temporary stabilized construction entrance, and silt fence downslope of all proposed disturbances and when work is proposed within 100' of a downslope wetland. See Sheets C-103 through C-105, ***Exhibit NBS-AB-2***. Construction will also be phased so that no more than five acres of concurrent disturbance will occur if the Project applies for a Moderate Risk Construction Stormwater Permit. No more than 10 acres of concurrent disturbance shall occur if the Project applies for an INDC permit. These are established and proven measures accepted by ANR to prevent soil erosion from occurring and address any potential construction-related stormwater runoff effectively before it reaches receiving waters. Implementation of these measures will prevent undue soil erosion and protect water quality.

Q14. Will the Project require an operational stormwater permit?

A14. The Project is subject to an existing Operational Stormwater Permit (#7214-9050.1). The Project proposes 7,979 sq. ft. of new impervious surface associated with the access road and equipment pads. However, approximately 16,984 sq. ft. of existing impervious road

surface will be removed and revegetated, resulting in a net decrease of approximately 9,005 sq. ft. of impervious area on the parcel. Following construction, the parcel will contain approximately 5.18 acres of total impervious surface compared to the 5.39 acres of impervious currently permitted under Permit 7214-9050.1. Because the Project results in a net reduction in impervious area and there are no changes to the manner of discharges, no additional stormwater treatment practices are required. However, due to the change in the location of the access road and the total impervious, a minor amendment to the existing operational permit is required. No changes are proposed to the existing infiltration stormwater treatment systems. ***Exhibit NBS-AB-2***.

Q15. Will the Project cause unreasonable soil erosion or the reduction in the capacity of the land to hold water so that a dangerous or unhealthy condition may result?

A15. No. The implementation of erosion prevention and sediment control measures outlined above during construction and consistent with the EPSC Plan and in compliance with the stormwater permit that the Project will obtain will ensure that sediment is appropriately contained and managed on the site during construction. The Project will be constructed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control (2025). With these measures, the Project will not cause unreasonable soil erosion or reduction in the capacity of the land to hold water so that a dangerous or unhealthy condition could result.

Q16. Will the Project increase stormwater flows to any residence in the Project vicinity?

A16. No. The Project proposes minimal change to the flow of existing stormwater and no stormwater will be directed towards any of the nearby residences. All stormwater runoff from the proposed impervious surfaces will be directed to the existing stormwater infiltration basin. The area under the array will become a grassed meadow area which will be mowed infrequently and will help to promote the infiltration of stormwater runoff and reduce erosion compared to current site conditions.

Primary Agricultural Soils – 10 V.S.A. § 6086(a)(9)(B)

Q17. Will the Project have an undue adverse impact on any Primary Agricultural Soils, as defined by 10 V.S.A. § 6001(15)?

A17. No, the Project will not have an undue adverse impact on primary agricultural soils ("PAS"). There are ±20.34 acres of mapped PAS on the Project parcel, with ±7.32 acres of mapped PAS within the limits of disturbance ("LOD"). These mapped PAS soils are located within parts of the current gravel and sand pit operation, which will be reclaimed by the pit owner prior to commencing construction on the Project. The Project does not propose any excavation disturbances to areas with mapped PAS soils, and therefore no soil stockpiles will be necessary as there will be no PAS removed to be stored. See ***Exhibit NBS-AB-2.***

Q18. Does that conclude your testimony at this time?

A18. Yes, it does.