

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Northland Solar, LLC for a
Certificate of Public Good, pursuant to 30
V.S.A. § 248a, for approval to install and
operate a 4.999 MW solar generation
facility in Lowell, Vermont

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Case No. 25-2346-PET

PREFILED REBUTTAL TESTIMONY OF SETH GODDARD

May 20, 2026

Summary: Mr. Goddard’s rebuttal testimony addresses the revised site plan and responds to testimony and exhibits from Intervenors and the Town of Lowell regarding the Project’s limited impacts within the Groundwater Source Protection Area.

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

2 A1. My name is Seth Goddard. I am Vice President of Krebs and Lansing Consulting 2 Engineers,
3 Inc. (“K&L”) and my business 3 address is 164 Main Street, Suite 201, Colchester, VT 05446.

4
5 **Q2. Have you previously submitted testimony in this proceeding?**

6 A2. Yes, I submitted prefiled direct testimony on behalf of Petitioner Northland Solar LLC (“NS” or
7 “Northland Solar”) on October 1, 2025.

8
9 **Q3. What is the purpose of your rebuttal testimony?**

10 A3. I address the changes in the revised site plan in *Exhibit NS-TH-2 (Rev.)*, which will result in
11 less soil disturbance and reduced primary agricultural soil (“PAS”) impacts. I also respond to
12 concerns expressed by Intervenors regarding the safety of the Groundwater Source Protection
13 Area near the Project site.

14
15 **Q4. Please summarize the changes to the Project design and provide any relevant updates in
16 terms of impacts to PAS or other Section 248(b) criteria that you previous testified on.**

17 A4. The proposed revisions to the Project design remove a substantial section of panels from the
18 south and southeastern most portions of the Project area. The panels will now be fixed-tilt, rather
19 than single-axis trackers, and will face south in rows running east to west. The fence line has
20 changed to reflect the smaller Project array footprint. These changes have reduced the fenced-in
21 footprint of the Project by approximately 5 acres, or roughly 19% of the original size, from +/-
22 26.97 acres to +/-21.88 acres, and the limits of disturbance (“LOD”) from +/-32.97 acres to +/-

1 30.70 acres. Additionally, the potential impact to mapped PAS within the LOD has been
2 reduced from +/-30.27 acres to +/-28 acres. The proposed PAS disturbances from trenching and
3 road construction have not changed.

4 I understand that since my direct testimony was filed, the Petitioner has entered into a
5 Memorandum of Understanding with the Agency of Agriculture, Food & Markets (the “AAFM
6 MOU”), which was previously submitted as *Exhibit AAFM-NS-1*. Under the AAFM MOU, the
7 Petitioner has agreed to mitigation conditions in the Certificate of Public Good that will require
8 stockpiling of any removed PAS within the fenceline and other related requirements consistent
9 with AAFM’s soil reclamation guidelines. With these conditions, which are standard conditions
10 that AAFM requests for solar facilities like this, AAFM agrees that the Project will not have an
11 undue adverse impact on PAS. The reduction in LOD does not change these requirements but
12 will lessen the amount of PAS potentially impacted from construction.

13
14 **Q5. Does this change your previous conclusions regarding the Project’s compliance with the**
15 **soil erosion, water purity, or PAS criteria under Section 248(b)?**

16 A5. No, the changes reduce the amount of soil disturbance, including PAS, so the impacts are
17 lessened. The changes do not impact the stormwater permit requirements, which Petitioner will
18 obtain prior to site preparation. There are also no changes proposed within the groundwater
19 source protection area (“SPA”) and no change in the distance between the closest Project
20 infrastructure and the SPA.

21

1 **Q6. The Town of Lowell has raised concerns about potential impacts from the Project on the**
2 **SPA and the Town’s drinking water supply generally. How do you respond to these**
3 **concerns?**


4 A6. No part of the fenced-in Project is located within the SPA. The closest solar panel is over 420
5 feet away from the SPA boundary line and the closest transformer is over 1,000 feet away. Thus,
6 to the extent that the Town is concerned about impacts from the Project equipment on the public
7 water supply, there is no overlap between the equipment and the SPA. The only aspect of the
8 Project that is within the SPA is a small portion of the access drive installation (approximately
9 105 square feet), as well as several utility poles carrying overhead wire. These elements are not
10 unique with the SPA, which includes parts of the transmission line, the nearby distribution line
11 on Route 100, Route 100 itself, and the portions of the utility substations. As I noted in my
12 direct testimony, Petitioner will take protective steps to avoid any unnecessary impacts on the
13 SPA, including not paving the access road, not using road salts or deicing agents within 200 feet
14 of the SPA, and ensuring all transformers have secondary containment systems that are designed
15 to hold 110% of oil plus 5” of freeboard. Given the substantial distance between non-utility
16 Project infrastructure, the current existence of utility poles and roads within the SPA, and the
17 additional measures proposed by the Project, there is no potential for undue adverse impacts on
18 the SPA or the general public water supply of Lowell from the Project.

19
20 **Q7. Does this conclude your testimony at this time?**

21 A7. Yes, it does.

I, Seth Goddard, 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.

Dated at Colchester, VT on the 20th day of May, 2026.


Seth Goddard