

STATE OF VERMONT
PUBLIC UTILITIES COMMISSION

Case No. 25-2346-PET

Petition of Northland Solar LLC
for a certificate of public good,
pursuant to 30 V.S.A. 248, authorizing
the installation and operation of
a 4.999 MW solar electric generation
facility in Lowell, Vermont

**TOWN OF LOWELL, LOWELL CEMETERY ASSOCIATION, LOWELL GRADED
SCHOOL BOARD, DOUGLAS AND DEBORAH MANNING, MICHAEL AND PAMELA
TETREAULT, AND MADONNA SULLIVAN'S RESPONSE TO NORTHLAND SOLAR
LLC'S SUPPLEMENTAL RESPONSE**

The Town of Lowell and the above-captioned Intervenors respectfully submit this response to Northland Solar LLC's Supplemental Response filed on June 12, 2026.

The Town and Intervenors continue to maintain that the revisions submitted by Northland Solar constitute substantial changes to the proposed project. While Northland asserts that the issue is now "essentially moot" because notice has been provided to affected landowners, the question before the Commission is not simply whether notice was mailed, but whether affected parties and the public have been afforded a meaningful opportunity to evaluate and respond to a materially revised project.

The Town and Intervenors appreciate Northland's representation that notice was provided to the newly identified landowners and respectfully request that those landowners be afforded a reasonable opportunity to participate in this proceeding should they choose to do so.

The Town and Intervenors remain concerned that the revised project design alters issues that are central to this proceeding, including visual impacts, aesthetics and more. The changes introduced by Northland require additional review by the Town's aesthetics expert and other participants. While Northland Solar characterizes the schedule as providing ample time, the practical reality is that municipal and citizen participants must coordinate expert review within limited budgets and resources. The Town's expert will need sufficient time to evaluate the revised plans, prepare discovery requests, review responses, and determine whether additional testimony is necessary.

The Town and Intervenors acknowledge the Petitioner's interest in moving this proceeding forward and appreciate the Commission's stay and opportunity for additional comment. At this time, the Town and Intervenors believe they can generally work within the revised schedule proposed by Northland Solar, provided there is adequate opportunity for expert review and meaningful participation by affected parties, including any newly notified landowners.

Finally, the Town and Intervenors note that the positions of the Department of Public Service, Agency of Natural Resources, and other parties regarding the revised project do not diminish the concerns raised by the Town and Intervenors. The Town and Intervenors continue to believe the project presents significant concerns related to the site location, aesthetics, and other issues previously identified in this proceeding. The revised plans do not eliminate those concerns, and the Town and Intervenors intend to provide further evidence regarding the impacts of the revised project design.

For these reasons, the Town and Intervenors respectfully request that the Commission continue to treat the revised filing as a substantial change requiring careful review and provide all affected parties a meaningful opportunity to evaluate and respond to the revised proposal.

Our Proposed Schedule

Follows the same spacing in time as the developer but gives a timeframe for new intervenors to join if you deem Substantial Changes and allows for our Aesthetics expert to do a full review of the changes in Panel Direction and height along with much more.

Event	Proposed Deadline by Developer	Proposed Deadline by Intervenors
New Intervenors Join by		June 26, 2026
Discovery requests on Petitioner’s rebuttal filing due	June 24, 2026	June 26, 2026
Responses to Discovery requests on Petitioner due	July 8, 2026	July 8, 2026
Non-Petitioners file surrebuttal testimony	July 15, 2026	July 15, 2026
Discovery requests on Non-Petitioners surrebuttal filing due	July 22, 2026	July 22, 2026
Responses to Discovery requests on Non-Petitioners due	July 31, 2026	July 31, 2026

Parties file witness order and anticipated timing of witness examinations, and comprehensive exhibit list and stipulations as to admission of testimony and exhibits	August 5, 2026	August 5, 2026
Evidentiary hearing	Week of August 24-28 or August 31-September 2	Week of August 24-28 or August 31-September 2
Deadline to file briefs	14 days after evidentiary hearing transcripts are received	14 days after evidentiary hearing transcripts are received
Deadline to file reply briefs	10 days after initial briefs are filed	10 days after initial briefs are filed

Dated at Lowell, Vermont this 19th day of June, 2026.

Respectfully submitted,

/s/Jennifer Blay

Jennifer Blay

/s/Byron Dolan

Byron Dolan

/s/Shaina Richardson

Shauna Richardson

/s/Douglas Manning

Douglas Manning

/s/Michael Tetreault

RESPONSE TO THE COMMISSION'S MAY 29, 2026 REQUEST REGARDING MOTION FOR SUBSTANTIAL
CHANGE DETERMINATION BY TOWN OF LOWELL, LOWELL CEMETERY ASSOCIATION, LOWELL
GRADED SCHOOL BOARD, DOUGLAS AND DEBORAH MANNING, MICHAEL AND PAMELA
TETREault, AND MADONNA SULLIVAN

Case No. 25-2345-PET
June 19th, 2026

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Michael Tetreault

/s/Madonna Sullivan

Madonna Sullivan