

**STATE OF VERMONT
BEFORE THE
PUBLIC UTILITY COMMISSION**

Petition of Chelsea Solar LLC, pursuant to 30)	Docket No. 17-5024-PET
V.S.A. § 248, for a certificate of public good)	
authorizing the installation and operation of the)	
“Chelsea Solar Project,” a 2.0 MW solar electric)	
generation facility located off Willow Road in)	
Bennington, Vermont)	

CHELSEA SOLAR LLC’S RESPONSE TO MOTION TO CHANGE SCHEDULE

On June 11, 2018, Libby Harris (“Harris”) and Lora Block (“Block”) filed a motion to change the hearing date in the above-captioned proceedings (the “Motion”) to either September 19, 20 or 21st. The Petitioner hereby objects to delaying the schedule. The Motion offers no explanation as to what the purported “unreconcilable conflict” is. At a bare minimum, Harris must explain what the alleged conflict is and why it is “unreconcilable,” to establish a reason to potentially change the schedule.

Even if she does so, the Petitioner requests that any change result in an earlier hearing date. Notwithstanding Harris’ lack of explanation for her request, Petitioner offered to agree to an earlier date for the schedule, any time between September 4 and the 13. Both the Department of Public Service and the Agency of Natural Resources confirmed they are available on September 5, 6 or 7th. No party stated that they are unavailable the first week of September, except Lora Block stated that she is not available on September 7 but otherwise would be available on September 5th and 6th. Harris did not respond to Petitioner’s proposal to move the hearing to the prior week. Instead she persisted that the hearing be delayed, not accelerated, to accommodate her “unreconcilable conflict.”

Moreover, there is no reason to believe that Harris' "unreconcilable conflict" could not be accommodated by other means. For example, Harris could attend the hearing by phone if she has a conflict that prevents her in-person presence. The parties have known about the scheduled hearing date for 3 months and now Harris wishes to further delay these proceedings without explanation.

Lastly, if the hearing officer agrees to change the date of the technical hearing from the currently scheduled date, the other scheduled dates in these proceedings should remain in place as they have nothing to do with the "unreconcilable conflict" of Harris.

Respectfully submitted,

/s/Michael Melone

Michael Melone
Allco Renewable Energy Limited
1740 Broadway, 15th Floor
New York, NY 10019
Phone: (212) 681-6974
Email: MJMelone@AllcoUS.com

Attorney for Chelsea Solar LLC

Dated: June 13, 2018