

Orchard Road Solar I, LLC

May 5, 2020

Mrs. Judith C. Whitney
Clerk of the Commission
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

RE: Response to PUC's April 30, 2020 Order Requesting Comments On Potential Further Extension of Commissioning Deadlines – Case No. 20-0789-INV

Dear Mrs. Whitney-

Orchard Road Solar 1, LLC has contracted with EDF Renewables to construct a 500kW Group Net Metered project in Middletown Springs, VT. This project is in-process and partially completed but the delays due to the Covid-19 crises and state mandated stay at home orders mean that the project will be seriously challenged to be completed in time to meet the deadline in its CPG (June 13, 2020). While the governor has relaxed some of the restrictions as of the date of this letter, getting crews back to work and prioritizing that work among all the other delayed projects that a contractor has (both within and outside of the solar realm) is difficult. In addition, access to suppliers and delivery of materials is challenging and will remain so for some time until we have a better understanding of the longer-term impacts of this crisis.

The challenges these projects face are not just regarding the restrictions related to the stay at home order. The Covid-19 crises has changed the economics of many of these projects and those that require the participation of the debt or equity markets are facing new challenges as well - banks are re-thinking their desire to take on new business and lend to projects. Other investors, including those who use the tax benefits are also reevaluating how or if to invest in general and questioning whether they will have the ability to use the tax benefits from the project.

I do not know how long the PUC should extend those CPGs whose deadlines fall between March 25, 2020 and December 31, 2020 since we are in very uncertain times and have many questions about how or if projects will move forward on several levels. I would say a one-year extension as proposed in the above Request seems reasonable and gives projects the breathing room to address the serious challenges we face now and in the future.

Sincerely,

A handwritten signature in black ink that reads "Doug S. Goldsmith". The signature is written in a cursive, slightly slanted style.

Doug Goldsmith