

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Norwich Upper Loveland Solar LLC)
for a certificate of public good pursuant to 30)
V.S.A. §§ 248 and 8010, authorizing installation) 21-3587-NMP
and operation of a 500 kW (AC) photovoltaic)
group net-metering system in Norwich, Vermont)

**SUPPLEMENTAL PREFILED TESTIMONY OF
MARTHA STASKUS ON BEHALF OF
NORWICH UPPER LOVELAND SOLAR LLC**

December 2, 2021

Ms. Staskus’ testimony confirms that the project will not conflict with a condition of any Act 250 permit and introduces Green Mountain Power Corporation’s (“GMP) letter and Feasibility Study determining that the project is in accordance with Rule 5.107(C)(10)(a).

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1 **1. Introduction**

2 Q1. Please state your name, occupation, and business address.

3 A1. My name is Martha Staskus. I am Chief Development Officer of Norwich Technologies,
4 Inc. (“Norwich Solar”), which has offices at 15 Railroad Row, Suite 101, White River
5 Junction, Vermont 05001. I submitted prefiled testimony on behalf of Norwich Upper
6 Loveland Solar LLC’s (the “Applicant”) petition in this case.

7
8 Q2. What is the purpose of your testimony?

9 A2. My testimony confirms that the Norwich Upper Loveland Solar LLC project (the
10 “Project”) construction will not interfere with the satisfaction of any condition contained
11 in the Act 250 Land Use Permit that applies to the Project host parcel and introduces Green
12 Mountain Power Corporation’s (“GMP) letter and Feasibility Study determining that the
13 Project is in accordance with Vermont Public Utility Commission (“Commission”) Rule
14 5.107(C)(10)(a).

15

1 Q3. Commission Rule 5.107(13)(entitled: “Statement of consistency with Act 260 Land Use
2 Permit”) provides:

3 If the host parcel is subject to an Act 250 Land Use Permit, the applicant
4 must file a document describing whether the construction of the proposed
5 net-metering system will interfere with the satisfaction of any condition
6 contained in the Act 250 Land Use Permit. If the construction will interfere
7 with the satisfaction of any Act 250 Land Use Permit condition, the
8 applicant must explain what steps it will take to address such issues or why
9 the applicant is unable to do so.

10 Will construction of the proposed Project interfere with the satisfaction of any condition
11 contained in an Act 250 Permit applicable to the host parcel?

12 A3. No. There is an Act 250 Permit that applies to a cell tower located on the Project host
13 parcel – LUP (Land Use Permit) #3W0917. As the Commission observed in its most recent
14 procedural order, the Project’s proposed overhead power line crosses the cell tower
15 driveway, and the Project’s proposed new gravel access road is an extension of the cell
16 tower’s access road. However, the Act 250 Permit does not contain any conditions that
17 limit, restrict, or apply to the installation of a solar generation facility and its related road
18 and electric line extension on areas adjacent to the cell tower, nor will such colocation
19 interfere with the cell tower operations.

20

21 Q4. Has GMP provided a letter that can be safely interconnected in accordance with
22 Commission Rule 5.107(C)(10)(A)?

23 A4. Yes. Please refer to Exhibit NUL MS-12, accompanying my supplemental prefiled
24 testimony which includes a letter from GMP as well as the results of their Feasibility Study.

1

2 Q5. Does this conclude your testimony?

3 A5. Yes.

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