



Vermonters for a Clean Environment

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT. 05620

Feb. 14, 2022

Re: Case No. 20-0789: Extension of net-metering and standard offer commissioning deadlines

Dear Ms. Anderson,

Vermonters for a Clean Environment has been following the recent submissions in this case in response to REV and AllEarth's request for a one-year extension of commissioning deadlines for standard offer and net-metering projects.

To date all the responses have referred only to solar projects. VCE supports the extensions for the numerous reasons identified by the respondents.

However, we take exception to applying a one-year extension to the Large Wind category. Unlike solar projects up to 2.2 MW which do not have a regional impact, Large Wind technology has regional impact that is highly disruptive to surrounding communities and citizens.

Currently, one Large Wind standard offer contract has been issued by the PUC and could be part of the proposed one-year extension for commissioning. Large Wind projects impact entire regions. In the current case, the Towns of Proctor, Pittsford, West Rutland, Castleton, Hubbardton, Rutland Town and Clarendon are all affected by the proposal, with the developer requiring numerous meetings with numerous towns in recent months. Citizens' lives and plans are being disrupted by one proposed 1.5 MW wind turbine.

The developer has stated his intention to use a Goldwind turbine. The same make of turbine was used on Georgia Mountain. Last year, the owner of the project, Greenbacker Renewables, had to replace a blade. The wind turbine was out of commission for 8 months while the blade traveled from China to the U.S. It is evident that the development of one 1.5 MW Goldwind turbine under the current supply chain and logistics issues could drag on for years.

In meetings with Towns since the end of 2021, the developer said he would apply for the CPG "in about a year", or around November 2022. Then the permitting process is proposed to take another year. With this extension, the disruption to numerous communities and citizens would last three or more years. For these reasons, we request that the Large Wind category not be included in the one-year extension. We recommend that the developer withdraw the contract and re-apply at a time when the project is ready to move forward in a timely manner.

Thank you for taking these comments into consideration.

/s/ Annette Smith

Annette Smith
Executive Director