

**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 )  
and operation of a 500 kW (AC) photovoltaic ) 21-3587-NMP  
group net-metering system in Norwich, Vermont )  
)

**Affidavit of Martha Staskus**

1. My name is Martha Staskus. I am the Chief Development Officer at Norwich Technologies, Inc., aka Norwich Solar, which has an office at 15 Railroad Row, Suite 101, White River Junction, Vermont 05001.
2. I have prepared and sponsored Testimony and Exhibits on behalf of the Applicant in this proceeding.
3. During the pre-CPG iterative project development process, no information was knowingly withheld or mis-stated by Petitioner to mislead the Town of Norwich, the Two Rivers Ottaquechee Regional Planning Commission (“TRORC”), the Landowners, or the Commission.
4. On August 4, 2021, the Vermont Agency of Natural Resources (“ANR”) emailed me with comments on the 45-day filing, noting that it had identified via LIDAR what appeared to be a vernal pool as part of a wetland located at the southern end of the array. The Applicant’s environmental consultant reviewed the location and the vernal pool and associated 100 foot buffer were added to the Project mapping.
5. The course of project development and review at the local and regional level leading up to the Project petition filing on August 31, 2021 was entirely consistent with the iterative process for development and review of solar projects. As compared to earlier conceptual designs shared with the Town and in the 45-day filing submitted on July 14, 2021, the Project array was shifted east by approximately 175 feet and reduced from the south by approximately 110 feet by the time the full Section 248 Application was completed and submitted to the Commission on August 31, 2021. This movement of the array design was necessary to avoid the recently identified vernal pool complex and its associated 100-foot buffer south of the array.
6. The Petition filing materials submitted in this case on August 31, 2021, were and remain true and accurate to Petitioner’s knowledge.
7. The array location is clearly depicted in the Site Plan, Exhibit NUL MS-2, and the elevations included in Exhibit NUL MS-3 are and remain true and accurate to Petitioner’s knowledge and belief.

On this 3rd day of June, 2022, I, Martha Staskus, do hereby swear and affirm that the information provided herein is true and accurate to the best of my knowledge and that I have personal knowledge of, and am able to testify as to the validity of the information contained herein. I declare that the above statements are true and accurate to the best of my knowledge and belief. I understand that if the above statements are false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.



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Martha Staskus

[NOTARIZATION WAIVED PER ORDER OF 3/30/20 IN CASE NO 20-0789-INV]