

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

21-3587-NMP

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Petition of Norwich Upper Loveland Road Solar LLC For a certificate of public good pursuant to 30 V.S.A. §§ 248 and 810, authorizing installation And operation of a 500 kW (AC) photovoltaic Group net-metering system in Norwich, Vermont	
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**MOTION FOR PRODUCTION OF AMENDED SITE PLAN**

Now come Neighbor Intervenors Stephen Gorman, Joy Kenseth, Dan and Jenn Goulet, Larry Ufford, Samin Kim, Jayoung Joo, Jay and Heather Benson, *pro se*, and respectfully request that the Commission Require the Applicant to submit an Amended Site Plan and associated explanations that reflect changes to the Limits of Disturbance, the access road and surrounding areas, as identified by the logger at a site visit on Nov. 15, 2022. See Exhibit DG-1 Affidavit of Daniel Goulet.

This is an urgent matter and requires immediate attention. Intervenors' Pre-Filed Testimony cannot be even remotely accurate without knowing how the Limits of Disturbance will be changed. How much more forest will be cut down in order to accommodate trucks and equipment, and improve the access road? How much forest along the old logging road (north to south) is planned to be cut down in order to remove trees on the very steep slope? Norwich Solar Technologies should have provided this information last December, and certainly long before the deadline to submit Pre-Filed Testimony.

Neighbor Intervenors also ask the PUC to evaluate the changes to the site plan, once filed, to determine if the Petition requires an Amendment as defined in Rule 5.103 (1)(2).

Dated this 17<sup>th</sup> day of November in Norwich, Vermont.

Respectfully submitted on behalf of Neighbor Intervenors Stephen Gorman, the  
Bensons, the Goulets, Samin Kim and Jayoung Joo, Larry Ufford and Joy  
Kenseth,

*/s/ Stephen Gorman*  
Stephen Gorman  
504 Hawk Pine Road  
Norwich, VT. 05055  
steve@stephengorman.com