

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 TO CHANGE SCHEDULE**

Now come Neighbor Intervenors Stephen Gorman, Joy Kenseth, Dan and Jenn Goulet, Larry Ufford, Samin Kim and Jayoung Joo, Jay and Heather Benson, *pro se*, and respectfully request that the proceedings in the Schedule Order of September 27, 2022 be rescheduled.

In order for Neighbor Intervenors to prepare Pre-Filed Testimony, they need to see and have time to evaluate an updated Site Plan and associated descriptions that incorporate new information resulting from a site visit by loggers on Nov. 15, 2022. See Exhibit DG-1 - Affidavit of Daniel Goulet.

The changes to the site plan described during the meeting with the loggers are likely to have a significant impact under the Aesthetics, Orderly Development, Greenhouse Gas, Erosion, Public Health & Safety criteria applicable to this 500 kW Net-Metering system proposal.

Informed and accurate assessments of the Project to be addressed in Pre-Filed Testimony require accurate and up-to-date information about changes to the Limits of Disturbance and about physical changes to the site with respect to construction, clear cutting, and movement of trucks and equipment in and out of the site, including changes proposed to be made to the access drive and surrounding area.

Non-Petitioners' Pre-Filed testimony is currently schedule to be due Dec. 1, 2022, two weeks from the filing of this Motion to Change Schedule. Testimony related to especially to Aesthetics, Orderly Development, and Public Safety cannot be completed until a full understanding of the tree clearing is provided.

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.

Non-Petitioners respectfully request that the schedule be adjusted to extend the schedule two weeks from the date when the Applicant provides the Amended Site Plan and associated descriptions of changes, and adjust all future dates accordingly, but that no deadlines occur between Dec. 23 and Jan. 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*

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