

**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)
group net-metering system in Norwich Vermont)

21-3587-NMP

**REBUTTAL TESTIMONY OF STEPHEN GORMAN ON BEHALF OF
STEVE GORMAN; JAY & HEATHER BENSON;
JENNIFER & DANIEL GOULET; PROFESSOR JOY KENSETH;
SAMIN KIM & JAYOUNG JOO;
LARRY UFFORD**

March 16, 2023

Mr. Gorman's rebuttal testimony responds to the testimony of Geoff Martin.

TABLE OF CONTENTS

1. Introduction.....3
2. Rebuttal of Geoff Martin.....4
3. Conclusion.....5

Exhibits

NN-SG-4 Vermont Forest Carbon Inventory

**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)

**REBUTTAL TESTIMONY OF STEPHEN GORMAN ON BEHALF OF
STEVE GORMAN; JAY & HEATHER BENSON;
JENNIFER & DANIEL GOULET; PROFESSOR JOY KENSETH;
SAMIN KIM & JAYOUNG JOO;
LARRY UFFORD**

1 **1. Introduction**

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

3 A1. My name is Stephen Gorman. I am self-employed. My business address and
4 residence is 204 Hawk Pine Road in Norwich, Vermont. I have previously
5 submitted testimony and exhibits of behalf of the Norwich Neighbor
6 Intervenors.

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

8 A2. My rebuttal testimony responds to the testimony submitted by Geoff Martin on
9 January 19, 2023.

1 **2. Rebuttal**

2 **a. Rebuttal of Geoff Martin's testimony on Greenhouse Gas Emissions**

3 Q3. On page two, lines 19-21 of his rebuttal testimony Mr. Martin states:

4 ..the per acres sequestration value used in the ForestCarbon-Nov.2016
5 PDF is inaccurate. This PDF can no longer be located on the FPR
6 website, apparently replaced by a correct and more current accounting
7 as part of the 2021 Vermont Forest Carbon Inventory.

8 How do you respond?

9 A3. When any Vermont citizen searches the internet for the answer to the
10 following question:

11 "Vermont's forests sequester how much carbon?"

12 the following answer, Exhibit NN-SG-4, comes up immediately. Therefore, it is not
14 out of date, as Mr. Martin claims. It is clearly current and available for any Vermont
15 citizen, such as me, to use to calculate carbon storage in an acre of Vermont forest in
16 2023:

17 [https://fpr.vermont.gov/sites/fpr/files/Forest_and_Forestry/Forest%20](https://fpr.vermont.gov/sites/fpr/files/Forest_and_Forestry/Forest%20Carbon-Nov2016.pdf)
18 [Carbon-Nov2016.pdf](https://fpr.vermont.gov/sites/fpr/files/Forest_and_Forestry/Forest%20Carbon-Nov2016.pdf)

19 This is the information on forest carbon storage that Vermont's Department of
20 Forests, Parks, and Recreation provides to Vermont citizens. Please see Exhibit
21 NN-SG-4, consisting of screenshots taken today, March 10, 2023.

1 **3. Conclusion**

2 Q4. Does this conclude your testimony?

3 A4. Yes.