



LEGAL COUNSELORS & ADVOCATES PLC
P.O. Box 827 • Colchester, VT • 05735

VERMONT PUBLIC
SERVICE BOARD
2015 SEP 17 AM 9 13

Leslie A. Cadwell
lac@lac.lca.com
802-342-3114

September 10, 2015

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street
Montpelier, VT 05620-2601

Re: Meteorological Tower on David Blittersdorf's Property at 700 Kidder Hill Road
in Irasburg, Vermont

Dear Mrs. Hudson:

I have been asked to respond to Commissioner Recchia's request for information from my client, David Blittersdorf, about a meteorological tower on David's Kidder Hill Road property located in Irasburg, Vermont.

In 2010, David purchased a piece of property in Irasburg so that he could build a log cabin for his personal use. In December of that year, he erected a meteorological ("met") tower on the property to assess whether there was sufficient wind to install a residential wind turbine to power the log cabin via net metering. The met tower is a 60-meter NRG TallTower that David invented. At the time, David was still a principal at NRG and was legally prohibited from competing with the company's commercial wind development clients. Because at that time he did not intend to install anything other than a residential installation, David believed that met towers for residential installations were not subject to the Board's jurisdiction. He checked into whether any local zoning would require a permit, and proceeded to install the met tower after concluding that Irasburg did not require a permit.

In November 2011, having concluded from the data obtained from the tower that the wind was adequate for a residential wind installation, David applied for CPG to net-meter two small wind turbines for the log cabin. CPG #NM-1771 was issued on January 5, 2012.

The possibility of a 5MW 2-turbine windfarm was not contemplated until sometime in October 2014. By that time, David became aware of new technology for low wind speed turbines that was going to be available by 2016. Second, David was no

#8585
4*

Sh
je
✓

longer with NRG and the non-competition restriction became inapplicable. Third, his log cabin was finally finished and ready for occupancy.

It is important for the Board, the Department, and the public to know that the data collected by the 60m high meteorological tower erected in Irasburg is not alone sufficient to provide the quality of data necessary for the type of modern, 90m high, 2.5MW wind turbines currently being contemplated for installation on David's Kidder Hill property. Moreover, the data that these met towers collect is not sufficient alone to secure financing for non-residential wind projects. Additionally, regulators and the public should know that other means exist to obtain wind data without the need for a tower or, apparently, a CPG. Thus, in connection with the Kidder Hill Community Wind Project, David had little incentive, and virtually nothing to gain, by erecting a met tower without first securing the necessary approvals.

Finally, the process for erecting the met tower on David's property involved significantly less earth disturbance and impacts than the disturbance and impacts resulting from developing the property for his residential use.

Please let me know if you need any further information.

Very truly yours,



Leslie A. Cadwell

cc: Christopher Recchia, DPS Commissioner
Geoffrey Commons, DPS Director for Public Advocacy
Deborah Markowitz, Secretary, ANR
David Blittersdorf

