

DG Vermont Solar, LLC

September 22, 2020

Via U.S. First Class Mail

Charlie Baker
Executive Director
Chittenden Regional Planning Commission
110 West Canal Street, Suite 202
St. Albans, Vermont 05478

Matt Krasnow
Chair
Charlotte Town Selectboard
P.O. Box 119
Charlotte, Vermont 05445

Peter Joslin
Chair
Charlotte Town Planning Commission
P.O. Box 119
Charlotte, Vermont 05445

Re: DG Vermont Solar, LLC 45-Day Notice for the 2.2 MW DG Vermont Solar Pringle Project at 2577 Lake Road, Charlotte, Vermont.

Dear Selectboard Members and Commissioners:

Introduction and Background

Pursuant to 30 V.S.A. § 248 and Vermont Public Utility Commission (“Commission” or “PUC”) Rule 5.402, DG Vermont Solar, LLC (“DG Vermont Solar”) hereby provides this 45-Day Notice to inform you that it is preparing to file a Petition for a Certificate of Public Good (“CPG”) with the Commission in accordance with Section 248 of Title 30 Vermont Statutes Annotated (“Section 248”), requesting approval to construct and operate an approximately 2.2 megawatt (“MW”) alternating current (“AC”), ground-mounted solar array at 2577 Lake Road, Charlotte, Vermont (“Pringle Solar Project” or “Project”).

The Project was selected as part of the 2019 Standard Offer Program by the Commission after recommendation by the Standard-Offer Facilitator.¹ The remainder of this Notice provides: (1) Project Description; (2) Preliminary Construction Transportation Plan including how equipment and materials will be transported to the Project Site; (3) Preliminary Assessment of Impacts; (4) Potential Project Benefits; and, (5) Local and Regional Planning Commission Engagement.

¹ VT PUC Case No. 18-2820-INV (Order dated 8/9/2019). A Vermont Standard Offer Power Purchase Agreement for the Project was executed by and between VEPP Inc., the Standard Offer Facilitator, and DG Northeast 1, LLC on November 13, 2019 (“Pringle PPA”). All rights, title, interest, liabilities, duties and obligations of DG Northeast 1, LLC under the Pringle PPA were assigned to DG Vermont Solar on July 21, 2020.

Project Description

As shown in Exhibit 1, the proposed Pringle Solar Project will be a 2.2 MW (AC) solar photovoltaic (“PV”) generation facility located on approximately 23 acres of an approximately 108-acre parcel in Charlotte, Chittenden County, Vermont (“Project Site”).² The Project Site is located on a parcel zoned “Rural” according to the Town of Charlotte’s zoning map (March 2016). Neighboring parcels to the north, west, and east are also zoned “Rural”. Neighboring parcels to the south are zoned “Commercial/Light Industrial” and “West Charlotte Village”.

As shown on Exhibit 1, the closest points of each side of the proposed solar array are:

- The east side of the proposed eastern solar array is located approximately 103-feet from the State of Vermont railroad right-of-way;
- The south side of the proposed solar array is located approximately 440-feet from the southern property line;
- The west side of the proposed solar array is located approximately 2,844-feet from Lake Road; and,
- The north side of the proposed solar array is located approximately 259-feet from the northern property line.

The area surrounding the Project consists of agricultural fields, forested land, low-density residential development, a railroad, an electric transmission/substation, and a mix of light industrial and/or commercial facilities.

The Project will include approximately 10,080 non-reflective solar PV panels installed in linear arrays and will utilize 28 string inverters. The panels will be mounted on single-axis trackers for racking. Rows of panels will run north to south and will be oriented at a tracking angle no less than +/- 50 degrees. Due to site constraints, the Project will consist of two “pods” contained within separate perimeter fences (*see* Exhibit 1). The overall length of the panel rows is anticipated to be approximately 880 feet in the north and south direction and approximately 1,275 feet in the east and west direction. The Project will also include a step-up transformer that will be cooled by mineral oil or FR3, if required. DG Vermont Solar anticipates using 7-foot minimum agricultural style perimeter fencing around the array pods in accordance with applicable electric and safety codes. Neither grading nor tree removal is anticipated for the Project.

As set forth in Exhibit 1, access to Project, both for construction and operation, will be from Lake Road utilizing an existing agricultural access path (“Access Road”). The Access Road, currently periodically used by farm vehicles, will be widened and improved as necessary. This may include upgrades to any existing culverts and establishment of a stabilized gravel surface with a maximum width of twenty feet.

A temporary laydown area will be used for equipment storage at the western end of the Project Site. Electrical equipment, including the transformer, will be pad mounted and located to the west of the western array pod, within the perimeter fence, and adjacent to the Access Road.

² The Standard Offer program requires the identification of Project location. As such, no alternative sites are included.

(see Exhibit 1). The transformer pad is anticipated to be 10' x 25' and will include secondary oil containment.

Construction will be performed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control, including a construction stormwater permit.

The Project will interconnect with the Green Mountain Power Corporation ("GMP") electrical grid at a three-phase distribution power line on Lake Road to the west of the Project Site. The proposed point of interconnection ("POI") is a GMP pole located on the east side of Lake Road south of the proposed Access Road. An underground electrical line will run from the proposed transformer across the subject property to the point where it will transition to a new overhead line extending to the POI on Lake Road (see Exhibit 1).

Construction & Transportation

DG Vermont Solar proposes to deliver materials to the Project Site via standardized trucking methods to a temporary construction staging area at the Project Site. The majority of transportation activity will occur during the approximately one-month construction phase. DG Vermont Solar will work with the town of Charlotte as necessary on traffic control requirements during construction. The Project is not expected to require oversize or overweight deliveries. During construction, access to and from the Project Site would be restricted by perimeter fencing in order to secure the Project Site and prevent the public from entering the array. Once operational, activity will consist of periodic visits to the Project Site by authorized personnel for operation and maintenance activities. All equipment associated with the Project will be installed in accordance with all applicable regulations and electrical codes.

Preliminary Impact Assessment

i. Interconnection

DG Vermont Solar submitted an interconnection application with GMP. A Feasibility Study for the Project was conducted in January, 2020. Moreover, DG Vermont Solar executed an Interconnection and Facilities Studies Agreement with GMP for the Project in February 2020. The Facilities Study for the Project was completed on April 1, 2020. DG Vermont Solar is currently working with the GMP Distributed Generation Coordinator to execute the site-specific interconnection agreement for the Project.

ii. Aesthetics

A preliminary aesthetics assessment was conducted in accordance with the requirements of Section 248 and PUC Rule 5.800. The assessment included site visits and inspections of the surrounding area on December 16, 2019, and January 29, 2020 along publicly accessible roads near the Project Site. The preliminary findings from the site visits and a viewshed analysis indicate that the Project will not result in undue adverse impacts to the aesthetics, scenic, and natural beauty of the area, and the Project would not violate any town or regional standards pertaining to scenic or open space resources. The preliminary aesthetic findings are summarized

as follows:

- Overall, visibility of the Project from public vantage points is expected to be low. Intermittent visibility of the Project may occur along a 0.50-mile length of Ferry Road and a 0.20-mile length of Lake Road. However, views of the Project in these areas will be isolated and broken up by a combination of intervening vegetation or structures. Where visibility may occur, it will be of short duration, partially obstructed, and backgrounded by existing landform and/or vegetation. In addition, the Project is visually compatible with other electric infrastructure in the area, including an existing substation approximately 0.20 miles from the Project Site and a separate solar array approximately 0.50 miles south of the Project.
- Due to the low visibility from surrounding public vantage points, landscape mitigation plantings is not anticipated.
- A preliminary review of the town and regional plans concluded that the Project was compatible with applicable aesthetic or scenic resource standards.
- A full aesthetic assessment will be included in DG Vermont Solar's Section 248 petition. DG Vermont Solar will also discuss consistency with both the Charlotte Town and Chittenden County planning documents for criteria that address Scenic Resources and Open Space.

iii. Environmental Impacts

Based upon the initial review of natural resources proximate to the Project Site, including use of public and privileged databases and field site visits, DG Vermont Solar has preliminarily identified natural resources within the Project Study Area.³ (Exhibit 2) The assessments are being conducted within an approximately 108-acre Study Area, which includes the subject property and all components of the Project (array, access road, interconnection).

Based upon the preliminary natural resources review, the Project will be designed to avoid and/or minimize impacts to environmental resources that have been identified within the Project's Study Area. Key elements include the following considerations:

- The following natural resources are not known to be present within the Project Area: Outstanding Resource Waters, Shorelines, Rare and Irreplaceable Natural Areas.
- The Project will be designed to avoid/minimize impacts to Class II wetlands and corresponding wetland/riparian buffers. DG Vermont Solar plans to optimize the Project design set forth in Exhibit 1 to incorporate input from applicable state agencies.
- Access to the Project site will require wetland and riparian area crossings largely consistent with existing access points. DG Vermont Solar will obtain applicable federal and state wetland permits, as applicable.

³ Preliminary field assessments were conducted in fall 2019 and summer 2020 to evaluate both the presence and/or absence of any natural resources. DG Vermont Solar plans to conduct a walkover with the Vermont Department of Environmental Conservation. In addition, a detailed natural resources assessment will be included in the Section 248 petition.

- Based on field assessments, Pringle Brook appears to originate within the Project Study Area that joins Holmes Creek offsite to the north and flows into Lake Champlain. Pringle Brook may include a river corridor. However, no new infrastructure is expected in the river corridor.
- There are no previously mapped state-significant natural communities, necessary wildlife habitats or protected or endangered species within the Project Study Area. DG Vermont Solar is completing a survey for rare, threatened, or endangered (“RTE”) plant species and state-specific natural communities within the Study Area. The results of the RTE study will be included in the Section 248 petition. Based upon a preliminary review, the Project design will not impact potential significant natural communities, RTE plant, or RTE animal species.
- While the Project will be located upon primary agricultural soil, DG Vermont Solar will propose mitigation and restoration measures to maintain the overall agricultural potential of the on-site soils.

Local and Regional Engagement

Vermont DG Solar has engaged in multiple outreach efforts with respect to the Project. Vermont DG Solar has had on-going communication with the landowner with respect to the Project, including the Project layout and design. Survey crews and other Project contractor visits have been coordinated with the landowner. In addition, adjoining landowners surrounding the Project were sent a “Welcome Package” discussing the Project. Surrounding landowners were also invited to an Open House for the Project that was held on December 5, 2019 at the Charlotte Senior Center. Based upon landowner feedback, the Project has been designed to locate the solar arrays on the eastern portion of the 108-acre parcel.

The Project team has communicated with the Vermont Agency of Natural Resources (“ANR”) and the U.S. Army Corps of Engineers (“USACE”). The Project’s environmental consultant conducted a site walk with the USACE in early September 2020 and field review by the ANR’s District Wetlands Ecologist in mid-September 2020 and anticipated incorporating feedback prior to finalizing site plans and the Section 248 petition.

Further Participation

DG Vermont Solar expects to file the Section 248 petition by the end of 2020 or early 2021 and will provide you a copy of the petition. Pursuant to Section 248(f), municipal and regional planning commissions may “[m]ake recommendations within 40 days of the petitioner’s submittal” of this Notice. Moreover, under Commission Rule 5.402(A), the municipal or regional planning commissions have the opportunity to make revised recommendations within 45 days after the date of the filing of the petition is filed with the Commission if the petition contains new or more detailed information that was not previously provided to said commissions. For additional information regarding the Commission Section 248 Process, including your right to participate in the Commission’s proceeding, please refer to the “Citizens’ Guide to the Vermont Public Service Board’s Section 248 Process,” which can be found on the Public Utility Commission’s website at: <http://puc.vermont.gov/document/citizens-guide-vermont-public->

service-boards-section-248-process

I welcome any questions or comments and look forward to discussing the Project with you and other local representatives. Please feel free to contact me at (561) 694-4768 or morgan.kerns@nexttearenergy.com

Sincerely,



Morgan Kerns
Lead Project Manager
DG Vermont Solar, LLC

Cc: Vermont Public Utility Commission
Vermont Department of Public Service
Vermont Agency of Natural Resources
Vermont Division for Historic Preservation
Vermont Agency of Agriculture, Food & Markets
Mr. Dean Block, Town of Charlotte, Town Administrator
Ms. Rebecca Foster, Town of Charlotte, Energy Committee Chair

Attachments:

Exhibit 1 – Preliminary Site Plan
Exhibit 2 – Natural Resource Map

20211815.1