

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Docket No. _____

Petition of Solar Renewable Energy)
Development, LLC for a certificate of public)
good, pursuant to 30 V.S.A. § 248, authorizing)
the installation and operation of a 2.0 MW solar)
electric generation facility located near the)
intersection of Route 103 and Trebo Road in)
Chester, Vermont)

PETITION FOR CERTIFICATE OF PUBLIC GOOD

NOW COMES Solar Renewable Energy Development, LLC (“SRED” or “Petitioner”), and hereby submits this Petition pursuant to 30 V.S.A. § 248 and Public Service Board (“Board”) Rule 5.400, requesting the Board to issue a Certificate of Public Good authorizing Petitioner to construct and operate a 2.0 MW solar electric generation facility to be located in Chester, Vermont (the “Project”).

By this Petition, Petitioner represents as follows:

1. Solar Renewable Energy Development, LLC is a Pennsylvania limited liability company with a business address of 4500 Lena Drive, Suite 102, Mechanicsburg, Pennsylvania.
2. This Project is being developed under Vermont’s Sustainably Priced Energy Enterprise Development (“SPEED”) standard-offer program. A Power Purchase Agreement (“PPA”) for the Project was executed with the state’s SPEED Facilitator on December 15, 2011.
3. Petitioner proposes to construct and operate the Project as a 2.0 MW (AC) solar electric generation near the intersection of Vermont Route 103 and Trebo Road in Chester, Vermont.
4. The principal Project components include:

- I. Approximately 8,000-9,000 solar photovoltaic modules rated approximately 280-295 watts each, mounted on vertical post-mounted arrays. The panels will be tilted at an angle of approximately 20 degrees, with minimum and maximum ground clearances of approximately 3 feet and approximately 10.5 feet, respectively. The arrays of panels will be grouped in rows running east to west;
 - II. Two Advanced Energy Power Station inverter enclosures, each consisting of two 500 kW inverters, an AC switchboard and a 1000 kVA step-up transformer. The inverter enclosures will measure approximately 31 feet long by 10 feet high by 12 feet tall and will be situated on concrete slabs or on concrete piers;
 - III. Electrical lines in underground conduit connecting combiner boxes to inverters;
 - IV. One 3-4-foot tall meteorological station located on one inverter enclosure;
 - V. An improved farm lane extending from Trebo Road south/southeast approximately 1,100 feet to the existing GMP right-of-way;
 - VI. Temporary staging areas (including a temporary fence during construction) will be located in the northwest area of the Project site where accessed from Trebo Road and west of the existing GMP right-of-way, on-site, near the termination point of the improved farm lane; and
 - VII. A 7-foot tall, chain-link perimeter fence.
5. The Project is designed to conform to the SPEED PPA at 2.0 MW (AC) based on the cumulative nameplate capacity of the inverters.
6. The inverters will convert the DC current generated by solar panels into AC current before being sent to Green Mountain Power Corporation ("GMP") 12.47 kV distribution line located within the existing transmission right-of-way.
7. As a renewable energy resource, the Project will contribute to meeting the regional and State's need for renewable power. Docket No. 7250, Order of 4/16/09 at 24.
8. As a developer of a SPEED project, Petitioner is not required to address 30 V.S.A. § 248(b)(2). PSB Rule 4.312.

9. The Petitioner is not a regulated utility having an obligation to provide a least-cost integrated plan. Therefore, 30 V.S.A. § 248(b)(6) is inapplicable to this Project. Docket No. 7250, Order of 4/16/09 at 89.

10. The Project does not involve construction of a waste-to-energy facility. Therefore, 30 V.S.A. § 248(b)(9) is inapplicable to this Project. *Id.* at 90.

11. On August 31, 2010, the Board issued a procedural order conditionally waiving the following Section 248(b) criteria for renewable projects with plant capacities that are greater than 150 kW but not more than 2.2 MW:

- 30 V.S.A. § 248(b)(2) (Need) (except for projects developed by utilities);
- 30 V.S.A. § 248(b)(4) (Economic Benefit)
- 30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(1)(c) (Water Conservation)
- 30 V.S.A. § 248(b)(5) & 10 V.S.A. §§ 6086(a)(2) and (3) (Sufficiency of Water and Burden on Existing Water Supply)
- 30 V.S.A. § 248(b)(5) & 10 V.S.A. § 6086(a)(6) (Educational Services)
- 30 V.S.A. § 248(b)(7) (Compliance with Electric Energy Plan)
- 30 V.S.A. § 248(b)(6) (Least-Cost Integrated Resource Plan) (with the exception of projects developed by utilities).

In Re: Simplified Procedures for Renewable Energy Plants with a Capacity Between 150 kW and 2.2 MW, Order of 8/31/2010 at 8.

12. Because the criteria listed in paragraph 11 are conditionally waived for this Project, Petitioner is not required to address these criteria to support its request for a CPG.

13. The Board is not required to make positive findings as to any of the criteria referenced in paragraphs 8 through 11 of this Petition in order to find that the Project will promote the general good of the state.

14. In support of this petition, Petitioner submits testimony and exhibits sponsored by

the following witnesses:

<u>Witness</u>	<u>Subject</u>
Richard M. Mazza (SRED)	Introduces the witnesses offering testimony in support of the Project, provides an overview of the proposed Project, addresses decommissioning of the Project, and explains how the Project addresses certain § 248 criteria, including orderly development and impacts upon noise, public health and safety, transportation, municipal services, historic sites and public investments.
Jeffrey E. Severson (Oakledge Environmental Services, Inc.)	Describes the Project's potential impacts upon natural resources and wildlife.
Michael Buscher (T.J. Boyle Associates, LLC)	Describes the Project's potential visual impacts.
Nicole Kesselring (Enman Kesselring Consulting Engineers, PC)	Describes the Project's potential impacts on soil erosion, waste disposal and primary agricultural soils.
Christopher P. O'Neil (Solar Design Associates, Inc.)	Describes the Project's potential impacts upon system stability, reliability and transmission infrastructure.

15. The Project will promote the general good of the state in that it:

(a) will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the Chester and Southern Windsor County Regional Planning Commissions, the recommendations of the Chester Selectboard, if any, and the land conservation measures contained in the Chester Town Plan, in accordance with 30 V.S.A. §248(b)(1);

(b) will not adversely affect system stability and reliability in accordance with 30 V.S.A. §248(b)(3);

(c) will not have an undue adverse effect on aesthetics, historic sites, air and water purity, the natural environment and the public health and safety, in accordance with 30 V.S.A. §248(b)(5);

(d) does not involve a facility affecting or located on any segment of the waters of the state that has been designated as outstanding resource waters by the Water Resources Panel, in accordance with 30 V.S.A. §248(b)(8); and

(e) can be served economically by existing or planned transmission facilities without undue adverse effect on Vermont utilities or customers in accordance with 30 V.S.A. §248(b)(10).

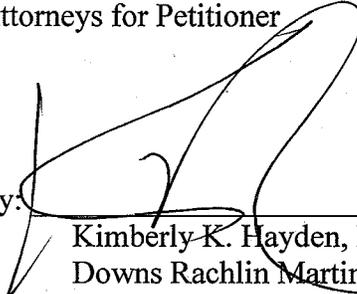
Request for Relief

WHEREFORE, Petitioner respectfully requests this Board to:

- A. Docket this Petition and schedule a prehearing conference in this matter as expeditiously as possible;
- B. Hold hearings as the Boar determines necessary;
- C. Make findings as required by 30 V.S.A. § 248;
- D. Issue final Findings, a final Order and Certificate of Public Good approving the Project;
- E. Certify the Project as a SPEED project; and
- F. Take such other action as may be required for the expeditious review of this Petition.

DATED at Burlington, Vermont, this 14th day of December, 2012.

DOWNS RACHLIN MARTIN PLLC
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