STATE OF VERMONT
PUBLIC SERVICE BOARD

Petition of Gilman Renewal Solar, LLC, pursuant to 30 V.S.A. §§ 248 and 219a(m)(2), for a certificate of public good authorizing the installation and operation of a 2.1 MW net metered solar electric generation facility to be installed on behalf of one or more municipalities on a closed landfill in Lunenburg, Vermont, to be known as the "Gilman Landfill Solar Project"	)	Docket No. _____

PETITION FOR CERTIFICATE OF PUBLIC GOOD

NOW COMES Gilman Renewal Solar, LLC ("GRS"), and files this Petition, pursuant to 30 V.S.A. §§ 248 and 219a(m)(2) and Public Service Board ("Board") Rule 5.400, requesting the Board to issue a Certificate of Public Good ("CPG") for the Gilman Landfill Solar Project ("Project").

By this Petition, GRS represents as follows:

1. GRS is a Vermont limited liability company, with principal offices at 717 Atlantic Ave. Suite 1A in Boston, Massachusetts.
2. The Gilman Landfill Solar Project is a proposed 2.1 megawatt solar electric generation project to be installed on behalf of one or more Vermont municipalities on a closed landfill site formerly known as the Simpson Paper Facility near 220 Treatment Plant Road in the Village of Gilman in the Town of Lunenburg, Vermont.
3. The Project will occupy approximately 14.5 (+/-) acres of a 37 acre (+/-) parcel.
4. The nameplate capacity of the Project is 2.1 megawatts (MW) AC. The expected net energy output of the Project is 3,282 megawatt hours of electricity (MWh) (3,282,000 kWh) per year. This is the equivalent of the annual electricity consumption of approximately 465 homes, based upon the average residential electricity use in the Green Mountain Power service territory.

5. The Project is being developed as a net metered facility pursuant to 30 V.S.A. § 219a(m)(2), which allows for the installation of net metered facilities of capacity up to 5 MW if the project is installed by or on behalf of one or more municipalities on a closed landfill. The Project is a 2.1 MW solar electric generation facility installed on a closed landfill site on behalf of one or more municipalities, including the Town of Colchester and other municipalities to be identified later.

6. GRS is currently in the process of discussing the Project with the interconnecting electric company, Green Mountain Power ("GMP"). Depending upon the outcome of those discussions, GRS may elect to sell the output of the Project by a different means than net metering. GRS will update the Board as to the resolution of those discussions. Until that time, GRS requests that the Board review the Project under both §§ 219a(m)(2) and 248. GRS has included testimony in the Petition on both the net metering and Section 248 Project requirements so that the Board can conduct its review under either statutory framework.

7. At present, GRS plans to retain the environmental attributes generated by the Project, including all Renewable Energy Credits (RECs). GRS will be seeking to enter into a mutually beneficial arrangement with Green Mountain Power ("GMP"), which could include the sharing of some portion of those RECs. Such an arrangement would necessarily be contingent upon GRS and GMP otherwise reaching an acceptable agreement on net metering, and the Board granting GRS a CPG for the Project. GRS is confident that an agreement could be reached that would allow GMP to enjoy a portion of the environmental attributes while providing GRS with a just and reasonable rate of return in light of the Project's costs and risks.

8. This Project represents an opportunity to site a solar project in the type of location -- a closed landfill or "brownfield" – that is considered preferred under both existing[1] and evolving state policy. The Vermont Solar Siting Task Force, for instance, specifically identified landfills and other

[1] See 30 V.S.A. § 219a(m)(2).

previous-developed areas as "Preferred Areas" for the siting of solar development in the state.[2] The Project will thus utilize land which could not otherwise be developed, placing it back into productive use generating renewable energy and providing net metering and other benefits to participating municipalities and the State of Vermont.

9. The Project will contribute positively to the local and State economy through the use of in-state suppliers, contractors, and consultants, and the payment of local and state property taxes.

10. The Project's equipment consists of the following: individual polycrystalline solar photovoltaic panels, a combination of ground-mounted and ballasted metal support structures under the panels to create south-facing arrays, electrical lines in above-ground conduit connecting the panels to the inverters and switch gear enclosure, and overhead electrical lines from the interconnection transformer to the GMP distribution system. The individual panels making up each solar array are anticipated to be approximately 310 watts each (depending upon the final selection of a solar installer and panel manufacturer). While each panel may be somewhat less or more than 310 watts, the total project size will not exceed 2.1 MW (AC).

11. Approximately 8,820 individual 310-watt solar panels will be used. The solar panels will be attached to a fixed mounting system composed of steel, concrete, and aluminum support pieces. On the capped portion of the landfill facility, this support structure will be ballasted and all equipment will be installed above-ground so that the landfill cap will not be impacted. The mounting structure will be arranged in east to west rows with panels placed two high on each row. The panels will be tilted at 30 degrees and will face solar south (195 degrees magnetic).

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[2] *Solar Siting Task Force Report to the Vermont House and Senate Committees on Natural Resources and Energy, the House Committee on Commerce and Economic Development, and the Senate Committee on Finance* (January 22, 2016). http://solartaskforce.vermont.gov/sites/solarsiting/files/documents/final_report/Solar%20Siting%20Task%20Force%20Report_Final_012216.pdf.

12. The inverters will convert the DC current generated by the solar panels into AC current. Thirty-five (35) 60 kW inverters will be utilized. All electrical conduits and lines will run overhead from the solar panels to the inverter enclosures on the capped portion of the closed landfill, and electrical conduits and lines will run underground from the solar panels to the inverter closures off the capped portion of the closed landfill. The inverters will be connected to one of three transformers which will transform the 400-volt inverter output to 12 kV for interconnection to the Green Mountain Power system.

13. In support of this Petition, GRS submits testimony and exhibits that address each of the applicable 248(b)(5) criteria.

14. Although the Project is 2.1 MW rather than the ordinary 500 kW size limit for net metering, it is authorized pursuant 30 V.S.A. § 219a(m)(2). However, the abbreviated comment period and application process that applies to 500 kW and smaller net metered systems under PSB Rule 5.108 does not necessarily provide an appropriate review process for a MW–scale project of this type. The Petition thus complies with the more comprehensive procedures of Section 248 and Rule 5.400 and GRS anticipates that a full 248 section review will be conducted.[3]

Request for Relief

WHEREFORE, GRS respectfully requests this Board to:

A. Hold a prehearing conference as expeditiously as possible on the Petition;

B. Hold technical hearings, if the Board determines such hearings are necessary;

C. Render a decision on this Petition no later than early September 2016;

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[3] Subject only to the potential settlement of issues with parties in the case that could truncate the review process, and subject to the Board's *Order re: Simplified Procedures for Renewable Energy Plants with a Capacity Between 150 kW and 2.2 MW* (August 31, 2010), which provides a limited set of conditional waivers of certain section 248(b) criteria.

D. Make findings as required by 30 V.S.A. § 248 finding that GRS shall be authorized to construct and operate a 2.1 MW solar electric generation facility installed on behalf of one or more municipalities, specifically the Town of Colchester, on a closed landfill as a net metered facility and that the Project will promote the general good of the State of Vermont, and authorize GRS to undertake the actions described herein and in the attached testimony and exhibits and issue a Certificate of Public Good to that effect; and

E. Take such other action as may be required for the expeditious review and approval of this Petition.

DATED at Burlington, Vermont, this 31st day of March, 2016.

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