

Wallingford Solar LLC
PO Box 1204
Manchester Center, VT 05255

May 21, 2018

Town of Wallingford Selectboard
75 School Street
Wallingford, VT 05773

Town of Wallingford Planning Commission
75 School Street
Wallingford, VT 05773

Rutland Regional Planning Commission
PO Box 965
Rutland, VT 05702

RE: Wallingford Solar LLC's Proposed Standard Offer Solar Project in Wallingford, VT
45-Day Notice of Petition to be filed with Vermont Public Utility Commission

Dear Selectboard Members and Commissioners,

Pursuant to 30 V.S.A. § 248 and Public Utility Commission Rule 5.402, Wallingford Solar LLC ("Wallingford Solar") is pleased to submit the following pre-application notice concerning its proposed 2.2 megawatt (MW) solar project ("the Project"), to be sited on a parcel of land located off of Creek Road in Wallingford, Vermont.

I. Introduction

Wallingford Solar is preparing to file an application for a Certificate of Public Good ("CPG") with the Vermont Public Utility Commission ("Commission"), requesting approval to install and operate a 2.2 MW solar electric generation facility in Wallingford, Vermont (the "Project"). The electricity from the Project will be sold to Vermont's electric utilities under the state's Standard Offer Program.

The remainder of this letter briefly describes: (1) Wallingford Solar's plans for construction and operation of the Project, including how equipment and materials will be transported to the site; (2) the expected economic and social benefits of the Project; (3) the preliminary assessment of impacts; (4) the expected date an application will be filed with the Commission; and (5) the rights of entities receiving this notice to comment on the project plans in accordance with Commission Rule 5.107(B).

II. Project Description and Construction Plans

The 2.2 MW (alternating current, or "AC") solar electric generation facility will occupy approximately 17 (±) acres of a 49.6 acre (±) parcel of land off of Creek Road in Wallingford, Vermont. See Location Map, Site Plan, and Preliminary Aesthetics Analysis -- *Attachments A and B*.

The Project will consist of solar modules mounted on fixed metal racks, string inverters, electrical collector system components consisting of underground conduit, wire, AC combiner panel, and

AC disconnects. The interconnection equipment will include a pad-mounted 2.2 MW three phase transformer to step up the voltage to interconnect with the existing GMP distribution line located on the project parcel.

A preliminary Site Plan is included in *Attachment A-2*. It illustrates the anticipated location of the Project's components in relation to the surrounding area. Wallingford Solar chose the proposed location for this solar array based upon its solar exposure, accessibility to existing roads and distribution lines, and its minimal impacts on natural resources and the character of the area. The site was specifically chosen because we believe that the reuse of a heavily quarried and used site is an appropriate location for a commercial scale ground mounted solar project.

While the attached site plan represents the current preferred layout, the layout that will be contained in the final application may vary somewhat based upon further engineering, environmental, or other siting considerations. The final layout will be within the overall site area where environmental and other impacts have been evaluated for the purposes of this 45-day notice.

The basic parameters of the site plan include the following working assumptions:

- Access to the solar site will make use of the existing roads within the area, including Creek Road and a 25-foot-wide (\pm) access road.
- Construction will be performed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control (2006).
- Year-round daily access to the array is not required. Therefore, no on-site septic or water supply systems will be constructed. The solar project's energy production will be monitored remotely and, if any abnormal conditions are detected, technicians will be dispatched as required.
- The solar project will be enclosed by a perimeter fence that will meet applicable state and electric safety code standards.

Site Access & Equipment Delivery

Standardized trucking methods will be used to transport the panels and other project components (e.g. racking, wire, conduit, and construction materials) to the site. Typical tractor-trailer and box truck vehicles will be used to transport materials to the site for construction. The Project will not require any oversized loads. The existing access road coming off of Creek Road will be used for bringing in all construction-related equipment and machinery. Construction equipment will likely include a light duty crane or similar equipment to lift the panels in place, trucks to move racking around the site and a small trencher to install underground electrical wiring.

Solar Panels and Electrical Collection System

The Project will utilize 9,504 Canadian Solar 330-watt solar panels (\pm), or the equivalent, mounted on 528 racks with 18 modules or panels per rack (\pm). The solar arrays will be set on steel piles (foundations) which will hold the solar panels at a fixed angle of 30 (\pm) degrees, to maximize solar radiance collection. The bottom of the solar panels will be at approximately three feet above existing grade and the top at approximately 9.5 feet above grade.

The panels will be arranged in rows running east-west and grouped into three arrays designed to avoid impacting natural resources. The rows will be connected via underground electrical cable in conduit to string inverters, which convert the electricity from DC to AC. From the inverters, the electrical interconnect line will run underground to a three phase transformer. The existing distribution line on the parcel will be extended approximately 250 feet west, and new utility poles will be installed as necessary to support the additional span.

The final selection of all equipment will be made after a CPG is issued and contractors and vendors are selected.

III. Project Benefits

The Wallingford Solar Project is proceeding under Vermont's Standard Offer renewable energy program. The Standard Offer Program was enacted by the Vermont Legislature with the goal of promoting the development of in-state renewable energy sources. Standard Offer helps to ensure that the benefits of these new energy sources flow to the Vermont economy in general, and to the rate-paying citizens of the state in particular. The law provides the rate-paying public with affordable, stable energy prices by allowing small renewable energy projects, such as the Wallingford Solar Project, to bid on "standard offer" contracts, which are awarded to the projects offering the lowest prices for power. Under the Standard Offer law, the power is sold to all of Vermont's electric distribution utilities (i.e., not just the interconnecting utility).

The benefits that the Project will provide include, but may not be limited to:

- Payment of State educational and municipal property taxes.
- Purchasing project equipment from Vermont businesses, when commercially feasible.
- Employing Vermont businesses for pre-application, construction, and operation and maintenance work, when commercially feasible.

In addition to these economic benefits, the proposed solar electric facility will also result in important environmental benefits. The 2016 Vermont Comprehensive Energy Plan set a goal for the State to receive 90% of its energy from renewable resources by the year 2050, and solar power is needed to meet that goal. The solar energy produced by this Project will result in less electricity needed in the New England region from plants that likely use fossil fuel or nuclear energy. It will emit no air pollutants (including CO₂) in generating electricity, and thus will help in a small but measurable way to reduce global warming, acid rain, and the negative public health effects associated with the use of fossil fuel and the waste storage challenges presented by nuclear energy production.

IV. Preliminary Impact Assessment

Based upon the initial review performed by Wallingford Solar and its consultants, including the use of the State's environmental databases, the Project's location on a former gravel pit/hot mix asphalt

plant will either avoid or not cause undue adverse impacts to environmental resources, and will not create public health or safety concerns. Key elements include the following:

- The Project has been sited to avoid wetlands and streams.
- No rare/endangered plants, significant natural communities, or critical wildlife habitat are known to exist within the Project footprint.
- The Project will be designed to meet electric safety and utility interconnection standards for safe and reliable operation of solar electric facilities.
- The Project will require no new municipal services and will not pose undue burdens on town fire, police, or water/sewer services. The Project will not impact the ability of the town to provide educational services.
- As the preliminary aesthetic review provided as *Attachment B* indicates, the Project's visibility from public roads and nearby residences will be very limited or non-existent, due to the site's topography and surrounding vegetation. Accordingly, supplemental aesthetic mitigation measures are not needed for the Project.

V. Assessment of On-site Alternatives

The Standard Offer Program requires a renewable energy project to identify a specific location at the time it applies to participate in the program. Wallingford Solar identified its site and was selected as a Program participant through a bid system administered by the PUC. Thus, there is no alternative site that Wallingford Solar is entitled to develop under the Standard Offer Contract. Once the site was selected, Wallingford Solar and its consultants reviewed various configurations within the parcel in order to avoid and/or minimize environmental, aesthetic, or other impacts while maximizing energy output. The result of that process is a proposed configuration that utilizes a low impact mounting system and locates the solar array so as to avoid sensitive environmental resources.

VI. Expected Petition Filing Date with Vermont Public Utility Commission

Wallingford Solar intends to file a Section 248 petition and supporting materials with the PUC soon after the 45-day notice period expires, approximately mid-July, 2018.

VII. Municipal and Regional Planning Commissions' Comments to the Vermont Public Utility Commission

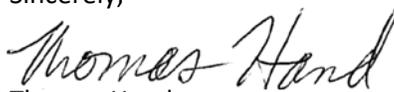
Under 30 V.S.A. § 248(f), municipal and regional planning commissions "shall make recommendations, if any, to the Public [Utility Commission] and to the petitioner at least seven days prior to filing of the petition with the Public [Utility Commission]." In addition, the planning

commissions are entitled to provide revised recommendations within 45 days of the date on which petitioner has filed a petition if the petition contains new or more detailed information that was not previously included in the petitioner's filing with the municipal and regional planning commissions pursuant to Section 248(f). See PUC Rule 5.402(A)(2).

For additional information regarding this process, including your planning commission's right to participate in the Commission 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>.

We here at Wallingford Solar hope that you will support this Project given the benefits it will provide to the town and the State, and given its extremely limited impacts. In the meantime, I invite you to contact me with any questions or comments you have at the information below, as we welcome your input and suggestions to make this a successful project.

Sincerely,



Thomas Hand

Wallingford Solar LLC

thomasjhand@gmail.com

802-688-3776

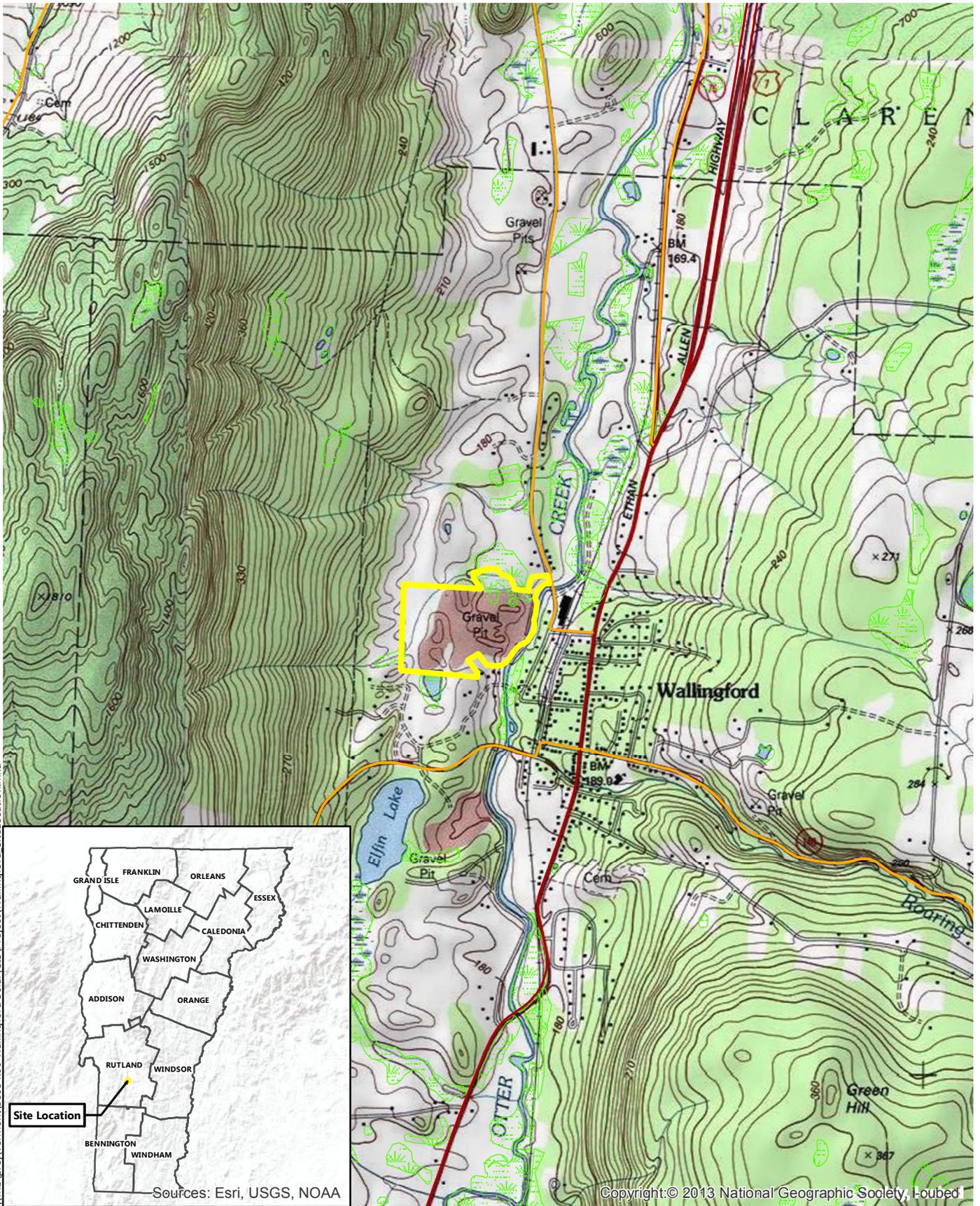
Enclosures:

Attachment A-1 – Location Map

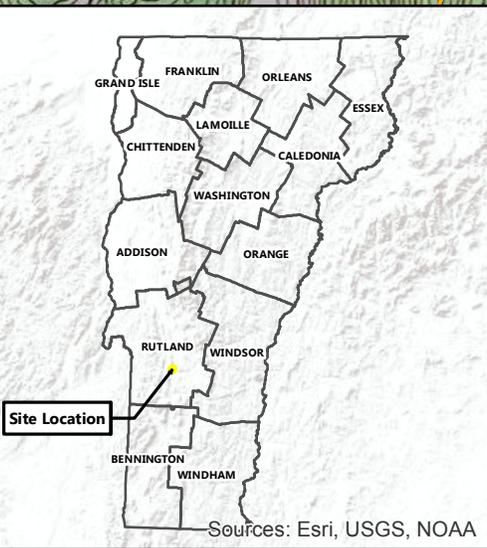
Attachment A-2 – Site Plan

Attachment B – Preliminary Aesthetic Analysis

Cc: Vermont Public Utility Commission
Department of Public Service
Agency of Natural Resources
Division for Historic Preservation
Agency of Agriculture, Food & Markets



\\vhb\proj\VT\58034.00 Wallingford Solar\GIS\Project\Wallingford_SiteLocation.mxd



Sources: Esri, USGS, NOAA

Copyright: © 2013 National Geographic Society, Foubed



Legend

- Project Parcel
- Interstate
- US Route
- Vermont State Highway
- Town Road

Wallingford Solar LLC

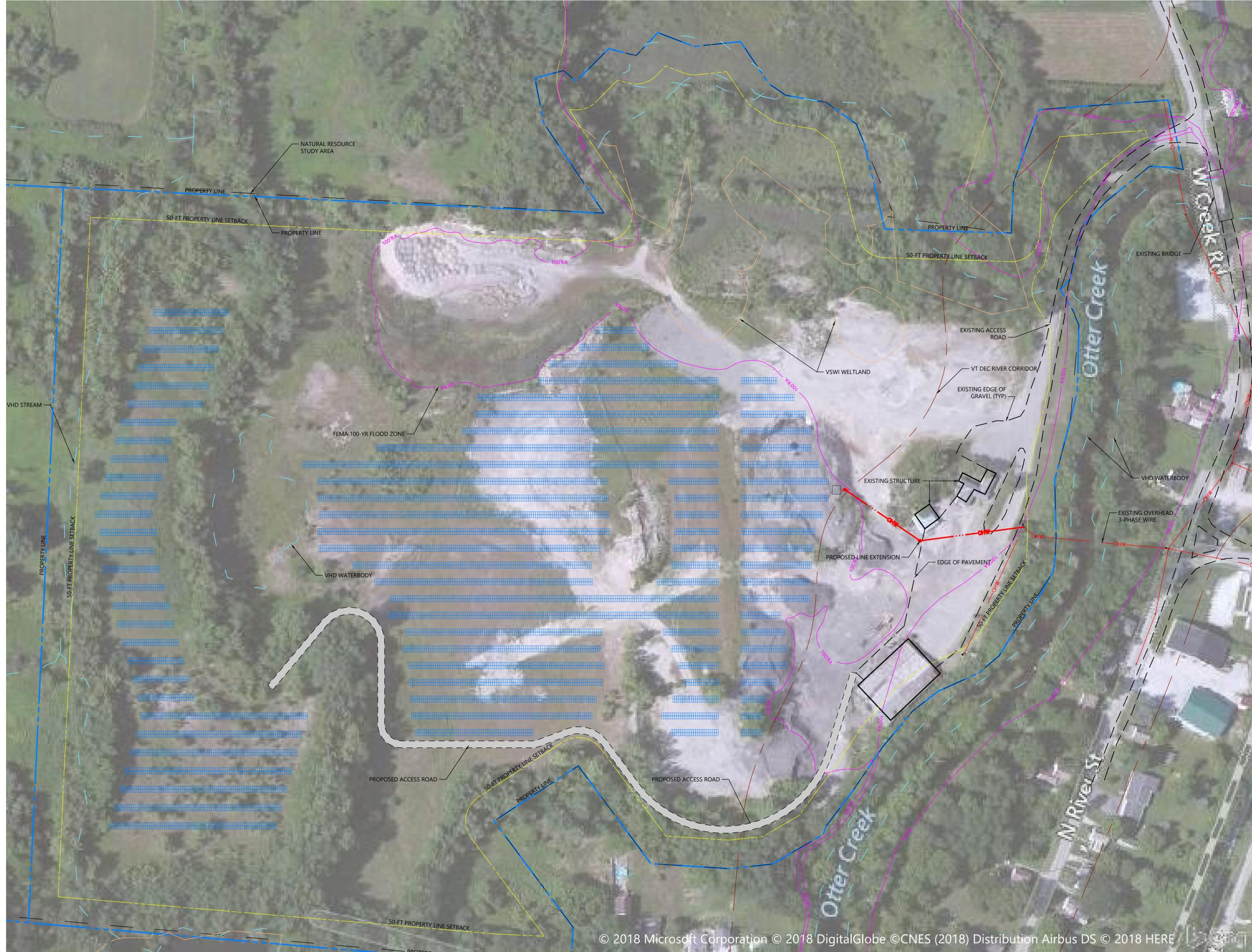
Wallingford, Vermont

Site Location Map

Sources: USGS Topographic Background from National Geographic Society (2013); Roads from VTrans (2011); VSWI Wetlands from ANR.



40 IDX Dr
Building 100 Suite 200
South Burlington, VT 05403
802.497.6100



North arrow icon
Scale bar: 0, 40, 80, 160 Feet
Wallingford Solar, LLC.
2.2MW Photovoltaic Array
139 Creek Rd.
Wallingford, Vermont

No.	Revision	Date	Appr.

Designed by: CJH Checked by: CAF
Issued for: 45-Day Notice Date: Apr. 25, 2018

Not Approved for Construction
Drawing Title: **Concept Site Plan**

Drawing Number
C-01

Sheet 1 of 1

Project Number
58034.00



Project Wallingford Solar Project
To: Wallingford Solar, LLC

Date: May 11, 2018

Memorandum

From: Michael Willard

Project #: 58034.00

Re: Preliminary Aesthetic Review

At the request of Wallingford Solar LLC ("Wallingford Solar"), VHB completed a preliminary aesthetic assessment of the proposed Wallingford Solar project ("Project") to be located at 139 Creek Road, Wallingford, Vermont, Rutland County.

INTRODUCTION

This preliminary aesthetic assessment is conducted in response to the requirements set forth for aesthetic review of energy generation projects under Title 30 Section 248 of the Vermont statutes and Public Utility Commission Rule 5.800.

PROJECT DESCRIPTION

The proposed Project is located within a subdivided 50-acre parcel of land located at 139 Creek Road. The Project is located at the site of a previously operating/reclaimed gravel pit and hot mix asphalt plant and industrial facility most recently operated by Pike Industries, Inc. The Project site is located on a parcel zoned Industrial according to the Town of Wallingford's zoning map. Neighboring parcels to the east of the Project site along River Street are also zoned Industrial. The eastern side of the proposed solar array is located approximately 220 feet from the Otter Creek at its closest point, and approximately 575 feet from River Street. The northern side of the proposed solar array is approximately 685 feet at its closest point from a private drive off Creek Road. The southern side of the proposed solar array is approximately 475 feet north of Elm Street.

The proposed Project will include a 2.2 megawatt (MW) solar generation facility consisting of solar panels attached to a fixed, ground-mounted racking system. The facility will be divided into three solar arrays due to existing topography and avoidance of natural features. The solar arrays are oriented in a south facing direction. The solar arrays on the eastern side of the parcel will stretch approximately 930 feet east-west at their combined widest point, and approximately 715 feet north-south. The solar array on the western side of the parcel will stretch approximately 300 feet east-west at its widest point, and approximately 915 feet north-south.

PROJECT VISIBILITY

VHB conducted a site visit and inspection of the surrounding area on April 11, 2018 along publicly accessible roads near the Project site. Based on the site visit and inspection, VHB determined that there will be minimal visibility of the Project from publicly accessible locations.

Views of the Project area will be limited due to intervening vegetation and the topography of the parcel. The parcel is surrounded by a mixture of mature trees and dense understory. Specifically, mature vegetation on the east side of the Project site parallel to Otter Creek will likely screen visibility from River Street. A mixture of mature deciduous and evergreen trees along the southern edge of the parcel will likely screen visibility from Elm Street. A mixture of mature



Memorandum

deciduous and evergreen trees along the northern edge of the parcel will likely screen visibility from the private driveway and residence off Creek Road. The Project site's varying topography will also limit visibility.

The overall visibility of the Project site is limited. The Project is visually compatible with the zoned industrial use of the site and neighboring parcels to the east of the project site, including Ames True Temper Corporation, the Wallingford Department of Public Works Town Garage, and the neighboring Vermont Railway railroad tracks. Our preliminary findings indicate that the Project would not result in an undue adverse impact to the aesthetics of the surrounding area. Due to the limited potential for visibility of the Project, we do not anticipate the need for landscape mitigation or other screening.

VHB will complete a full aesthetic analysis, including an evaluation of the Project under the Quechee Analysis, to be included with the Project's Petition for a Certificate of Public Good. The full aesthetic analysis will further examine the Wallingford Town Plan and applicable information from the Rutland County Regional Planning Commission.

The attached photographs taken during the site visit demonstrate the lack of visibility of the Project from surrounding publicly accessible locations and show project area aesthetics. Refer to Viewpoints 1-8 identified on drawing C-02 Context Map.



0 75 150 300Feet
Wallingford Solar, LLC.
2.2MW Photovoltaic Array
 139 Creek Rd.
 Wallingford, Vermont

No.	Revision	Date	Appr.

Designed by **CJH** Checked by **CAF**
 Issued for **45-Day Notice** Date **Apr. 25, 2018**

Not Approved for Construction
 Drawing Title
Context Map

Drawing Number
C-02
 Sheet **1** of **1**
 Project Number
58034.00



Viewpoint 1. Panoramic view from the intersection of River Street and Elm Street looking northwest. The southeast corner of the Project solar array is approximately 770 feet northwest from this location.



Viewpoint 2. Panoramic view from approximately 85 River Street looking northwest. The eastern edge of the Project solar array is approximately 575 feet northwest from this location.



Viewpoint 3. Panoramic view from the intersection of Maple Street and the railroad crossing, looking west. The eastern edge of the Project solar array is approximately 955 feet west from this location.



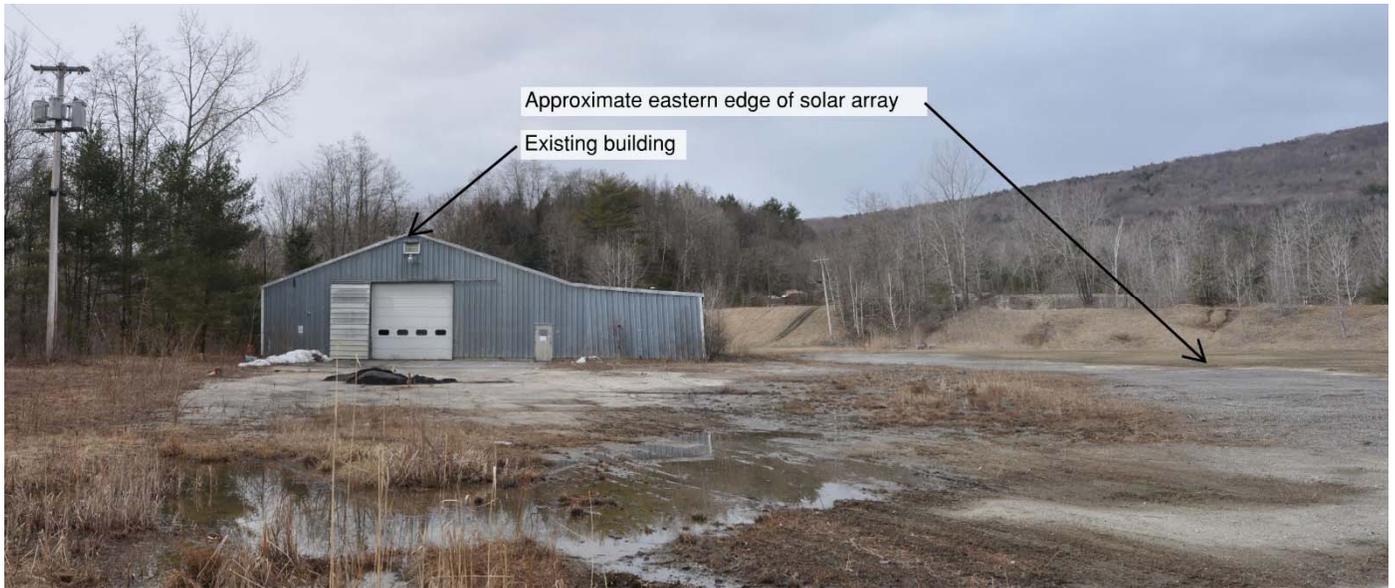
Viewpoint 4. Panoramic view from the intersection of the Project entry road and River Street looking southwest. The northeast corner of the Project solar array is approximately 860 feet southwest from this location.



Viewpoint 5. View looking north along River Street at the Ames True Temper Corporation wood manufacturing facility.



Viewpoint 6. View looking south along River Street at the Wallingford Department of Public Works Town Garage.



Viewpoint 7. Panoramic view looking southwest from within the project site towards an existing building. The eastern most boundary of the Project solar array is approximately 300 feet West of this location.



Viewpoint 8. Panoramic view looking northwest from within the project site towards existing buildings. The western edge of the Project solar array is approximately 300 feet west of this location.