

**State of Vermont**  
**Department of Public Service**  
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February 4, 2016

Mrs. Judith Whitney, Acting Clerk  
Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620-2701

Re: BDE East Montpelier Lazar Solar, LLC Group Net Metering Petition – 500 kW  
Route 2, East Montpelier, Vermont - 16-0001-NMP

Dear Mrs. Whitney:

On January 4, 2016, BDE East Montpelier Lazar Solar, LLC (the “Applicant”) filed with the Public Service Board (the “Board”) an application for authority to construct and operate a 500 kW solar group net metering system to be located off of Route 2 in East Montpelier, Vermont under the authority of 30 V.S.A. §§ 219a and 248, and Public Service Board Rule 5.100 (the “Project”). The Department has reviewed the Application and offers the following comments.

The Department is in receipt of the following comments concerning the Project:

- Zachary Sances (adjoining landowner) dated December 31, 2015
- Raymond and Courtney Stout (adjoining landowner) dated January 7, 2016
- Maurice and Barbara Brown (adjoining landowner) dated January 8, 2016
- Cliff Hickman (adjoining landowner) dated January 10, 2016
- Town of East Montpelier Planning Commission dated January 25, 2016
- Town of Montpelier Select Board dated February 2, 2016
- Vermont Division of Historic Preservation dated January 15, 2016
- Agency of Natural Resources dated February 1, 2016.

Mr. Sances and the Town of East Montpelier Planning Commission each filed motions to intervene in this proceeding. The Department has no objection to those parties’ intervention.

Mr. Sances and the Town of East Montpelier Planning Commission (the Town) each express concern about the Project’s potential aesthetic impacts under 30 V.S.A. § 248(b)(5). The Town makes a number of specific recommendations intended to address its aesthetic concerns, including undergrounding electrical connections, using a dark gray color on project equipment, a



post construction site visit to assess the adequacy of proposed screening, and enacting a plant maintenance plan for the life of the Project. We understand from speaking with the Town that the Town and the Applicant will meet to discuss the Town's concerns and recommendations; the Department supports parties' efforts to try and resolve issues in this manner. To the extent that the Board is required, pursuant to 30 V.S.A. § 248(b)(1), to give due consideration to the municipal planning commission's recommendations, the Department recommends that the Town provide the Board with an update of its discussions with the Applicant as soon as reasonably possible.

With respect to the System Stability and Reliability criteria under 30 V.S.A. § 248(b)(3), the Department notes that the Project failed Fast Track screening criterion #3. Exhibit BDE-AK-3. Green Mountain Power Corporation ("GMP") nevertheless concluded that the Project could be safely interconnected without the need for any further formal study. Where a project fails one or more Fast Track Criteria, the Department generally recommends that the Board require further information explaining, with engineering detail, what measures (if any) the utility recommends or requires to ensure that the project will not have an adverse impact on system stability and reliability. In this case, the Fast Track report does not adequately demonstrate why voltage flicker is not an issue with respect to the Project. Accordingly, the Department recommends that the Applicant procure from GMP, and file with the Board prior to construction, the flicker calculation for the Project made in accordance with Standard IEEE 1543.

Thank you for the opportunity to comment on this matter; please do not hesitate to contact me if you have any questions.

Sincerely,



Jeannie Oliver  
Special Counsel

cc: Joslyn Wilschek, Esq.  
Green Mountain Power Corporation  
Vermont Agency of Natural Resources – Evan Meenan, Esq.  
Division of Historic Preservation – Scott Dillon  
Zachary Sances  
East Montpelier Planning Commission – Jean Vissering  
East Montpelier Select Board – Seth Gardner