

**STATE OF VERMONT  
PUBLIC SERVICE BOARD**

PSB NMP No. \_\_\_\_\_

Application of BDE East Montpelier Lazar Solar, LLC     )  
Pursuant to 30 V.S.A. § 219a and Board Rule 5.100     )  
authorizing the installation and operation of a 500 kW     )  
solar group net-metered electric generation facility     )  
located off of Route 2 in East Montpelier, Vermont     )

**PREFILED TESTIMONY OF  
ANDREW THOMAS  
ON BEHALF OF  
BDE EAST MONTPELIER LAZAR SOLAR, LLC**

**Summary of Testimony**

Mr. Thomas' testimony provides an overview of the proposed project by BDE East Montpelier Lazar Solar, LLC to install and operate a 500 kW ground-mounted group net metering solar electric generation facility located off of Route 2 in East Montpelier, Vermont. It also describes the proposed project's relationship to certain criteria set forth in 30 V.S.A. § 248 and addresses compliance with Public Service Board Rule 5.105 relating to group net metering system requirements.

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1    **I.     Introduction**

2    Q1.    Please state your name, current employer, business address, and position.

3    A1.    My name is Andrew Thomas, and I am currently the Managing Director at Bullrock  
4            Deutsche-Eco, LLC (“BDE”). My business address is 145 Pine Haven Shores Road,  
5            Suite 1150, Shelburne, VT 05482.

6  
7    Q2.    Please describe your educational background and work experience.

8    A2.    My resume is attached as Exhibit BDE-AT-1.

9  
10   Q3.    Have you testified previously before the Public Service Board?

11   A3.    Yes. Previously, I have provided pre-filed testimony regarding the Charlotte Ferry Road  
12            Solar Project NMP# 6407, SSE II New Haven NMP # 5979, a 500 kW group net  
13            metering project for BDE Vergennes Poquette Solar, LLC, Docket 8665, BDE Grand Isle

1 Solar LLC (5 MW solar project) and the recently filed net-metering 500 kW solar  
2 application for BDE Danville Lazar Solar LLC.  
3

4 Q4. Who is the Applicant and what is their address?

5 A4. The Applicant is BDE East Montpelier Lazar Solar, LLC. Its mailing address is 145 Pine  
6 Haven Shores Road, Suite 1150, Shelburne, VT 05482. I will be the main contact for the  
7 Applicant and am available at 145 Pine Haven Shores Road, Suite 1150, Shelburne, VT  
8 05482.  
9

10 Q5. Please explain BDE's relationship to the Applicant.

11 A5. The Applicant retained BDE to provide development and project management services  
12 for the proposed 500 kW group net-metered ground-mounted solar array group to be  
13 located off of Route 2 in East Montpelier, Vermont (lot behind 2537 Route 2) (the  
14 "Project"). BDE has worked collaboratively with the Applicant and Project contractors  
15 to manage various aspects of development including site selection, engineering and  
16 design, environmental investigations, aesthetic impact analysis, interconnection  
17 evaluation, regulatory and public affairs, financial modeling and construction  
18 management.  
19

20 Q6. What is the purpose of your testimony?

21 A6. My testimony supports the Application by the Applicant for a Certificate of Public Good  
22 pursuant to 30 V.S.A § 219a and Board Rule 5.100 to construct the Project on property  
23 owned by Anthony and Jean Cassani at Route 2 in East Montpelier, Vermont (lot behind

1 2537 Route 2) (the "Property"). The Property is currently six separate subdivided lots  
2 that the Applicant proposes to utilize for the Project. The Applicant will have site control  
3 of the Project area, including all subdivided lots, (approximately 4 acres) if the Board  
4 issues a CPG for the Project. I provide a Project overview and also specifically address  
5 the following Section 248 criteria: (b)(1) orderly development of the region, (b)(5)  
6 aesthetics, noise, historic sites, waste disposal, transportation systems/traffic, and  
7 development affecting public investments. I also address the group net metering  
8 requirements under Board Rule 5.105. Witness Adam Crary will address portions of 30  
9 V.S.A. § 248(b)(5), including 10 V.S.A. § 1424a(d) outstanding resource waters,  
10 headwaters, waste disposal, floodways, streams, shorelines, wetlands, soil erosion, and  
11 threatened and endangered species; rare and irreplaceable natural areas and necessary  
12 wildlife habitat. Witness Allison Kimball will address the proposed electrical system  
13 components and the Project's compliance with 30 V.S.A. § 248(b)(3) system stability and  
14 reliability.

15  
16 **II. Project Description and Overview**

17 Q7. Please generally describe the proposed Project.

18 A7. The Applicant proposes to install the Project on approximately 4 acres of an 8.36 acre  
19 parcel of land, currently comprised of six separate parcels. The Project is located in an  
20 open field setback approximately 283 feet from Route 2, which is the closest road. The  
21 Project is on the north side of Route 2, adjacent to a RV dealership. Residential  
22 properties and existing trees are located between Route 2 and the Project site. The  
23 Applicant met with adjoining landowners to review the proposed Project. Based on that

1 meeting, the Applicant has shifted the Project further north and east to increase the  
2 setback distance from the Project and the adjoining property lines.

3  
4 The closest residence is located approximately 153 feet to the southeast of the Project  
5 site. The second closest residence is located approximately 196 feet to the south of the  
6 Project site. All other residences are in excess of 200 feet from the Project Site all  
7 generally to the south. See Exhibit BDE-AT-2.

8  
9 Q8. Please generally describe the site plan.

10 A8. The final site design and equipment selection will occur post-permit issuance; however  
11 such design will be substantially the same as shown in Exhibit BDE-AT-2. In summary,  
12 the Project will consist of:

- 13 • Approximately 2,684 solar panels installed on fixed, pile-driven post mounted  
14 racking systems across approximately 4 acres;
  - 15 ○ Coated with non-reflective glazing
  - 16 ○ Sloped at an angle of approximately 20 degrees
  - 17 ○ Approximately nine (9) feet high off the ground at their highest point
- 18 • Approximately 17 string inverters dispersed across the array that would convert the  
19 direct current (DC) generated by the panels to alternate current (AC);
- 20 • Network upgrades associated with interconnection of the system into Green Mountain  
21 Power's existing 3-phase service along Route 2, including installing approximately  
22 three new distribution poles. The first pole shall extend the existing three phase  
23 service across Route 2 and be located on the north side of Route 2. The second pole  
24 will extend from that point to the north east up the slight incline towards the Project  
25 site. The third pole located approximately in the middle of the southern edge of the  
26 Project Site shall be installed behind an existing large tree and vegetation to aid in  
27 screening, this pole shall carry the necessary pole mounted transformers;
- 28 • An approximate 8' perimeter fence with approximately 6" vertical spacing; and  
29 driven fence posts;

- 1           • New gravel access road to the Site, approximately 317 feet long.  
2

3           More specifically, the array consists of approximately 21 rows of racking units spread  
4           across the approximately 4 acre area. Rows of panels running east-west and are oriented  
5           due south and fixed at around 20 degrees. Racking systems will be roughly 3 feet on the  
6           low side and 9 feet on the high side and installed to pile-driven posts systems, generally  
7           without the use of concrete. A specification drawing of a typical foundation and racking  
8           system is shown in Exhibit BDE-AT-3.

9  
10          The Applicant would access the Project from Route 2 and other state and local roads,  
11          which are accustomed to the type of traffic representative of the proposed daily material  
12          delivery. No grading is necessary. The Applicant will construct a temporary staging area  
13          on the Project Site as shown on Exhibit BDE-AT-2.

14  
15          The Project includes the following minimum setbacks:

16                 -approximately 283 feet from the measured edge of Route 2

17                 -approximately 50 feet from the other property boundary lines  
18

19   Q9.    Will the Applicant need to permanently remove any trees for the Project?

20   A9.    The Project will require limited selective tree clearing of trees greater than 30 feet in  
21           height. The area where this will occur is along the south western edge of the open field  
22           area near the top of the slope, to minimize shading on the array (which work will be

1 performed between November 1 and April 14). The limits of tree clearing are shown on  
2 Exhibit BDE-AT-2.

3  
4 Q10. Does the Applicant propose to install a fence? If so, please describe.

5 A10. Yes. The Applicant proposes to install an approximate 8' perimeter fence with  
6 approximately 6" vertical spacing; and driven fence posts. Access to and from the  
7 Project would be restricted by perimeter fencing in order to secure the site and prevent  
8 the public from entering the array. Exhibit BDE-AT-3 includes a fence specification  
9 sheet.

10

11 Q11. Please explain the proposed construction schedule.

12 A11. Project construction is estimated to take three months depending on weather and other  
13 logistical constraints. The Applicant will perform construction Monday-Friday, 7:00  
14 A.M. to 7:00 P.M., Saturdays, 8:00 A.M. to 5:00 P.M. with no construction on Sundays  
15 or holidays.

16

17 Q12. What are the operation and maintenance activities for the Project?

18 A12. Once the Project is fully commissioned, operations and maintenance activities will be  
19 minimal. Routine maintenance will be performed one or two times per year.

20

21 Q13. Who will retain ownership of the environmental attributes?

22 A13. The Applicant will retain ownership of the environmental attributes.

23

1 Q14. Has the Town of East Montpelier adopted applicable screening requirements under Title  
2 24 as permitted in 30 V.S.A. § 248(b)?

3 A14. No, the Town of East Montpelier has not adopted applicable screening requirements  
4 under Title 24.

5

6 **III. Section 248 Criteria**

7 **Orderly Development of the Region**

8 [Section 248(b)(1)]  
9

10 Q15. Will the Project interfere with the orderly development of the region, giving due  
11 consideration to recommendations from municipal and regional planning commissions  
12 and municipal legislative bodies?

13 A15. No. The Project will have a favorable impact on the orderly development of the region,  
14 in that it will promote the use of locally generated renewable energy without overall  
15 adverse impacts to the scenic or natural beauty of the area. The Project is consistent with  
16 the June 3, 2013 East Montpelier Town Plan (“Town Plan”). The Town Plan does not  
17 give specific requirements for solar siting. It does, however, contain general statements  
18 supporting renewable energy:

19 -The goal of the Vermont Comprehensive Energy Plan is to supply 90% of  
20 our energy needs from renewable sources by 2050. East Montpelier  
21 shares this goal and has proposed specific actions to support it. These  
22 actions support greater efficiency, alternative modes of transportation,  
23 renewable energy sources, smart land development choices and building  
24 code compliance. Town Plan at 53.

25  
26 -It is widely agreed that the use of fossil fuels has a major influence on  
27 climate change. We should be looking to reduce our use of fossil based  
28 fuels and replace them with more sustainable sources. This would be  
29 beneficial to our energy security as well as have a positive effect on  
30 climate change. Town Plan at 53.

1  
2 The Town Plan also contains general statements and goals regarding general siting  
3 guidelines:

4  
5 -Simple guidelines for siting wind turbines exist (a brochure is available  
6 for download at [http://www.state.vt.us/psb/application\\_forms/application\\_forms.stm](http://www.state.vt.us/psb/application_forms/application_forms.stm)),  
7 but sensitive siting of solar panels on individual property should be  
8 considered. Energy projects are reviewed by the Public Service  
9 Department but the Town Plan and the concerns of local officials and  
10 commissions are considered. Town Plan at 54 (Exhibit BDE-AT-4).

11  
12 -Appropriate Siting of Energy and Transmission Facilities-New energy  
13 facilities including renewable energy projects as well as transmission and  
14 distribution lines should be sited and designed to respect the character of  
15 the surrounding area and neighborhood views. Town Plan at 55 (Exhibit  
16 BDE-AT-4).

17  
18 -The Planning Commission should provide guidelines for the siting and  
19 design of new energy projects including renewable energy projects; and  
20 should prepare guidelines for facilities associated with energy  
21 transmission including transmission lines, collector lines, and substations.  
22 Town Plan at 55 (Exhibit BDE-AT-4).

23  
24 -Preserve and enhance the aesthetic beauty of the town's landscape  
25 through a combination of public and private efforts, while maintaining  
26 sensitivity to the concerns and rights of property owners. Town Plan at  
27 87(Exhibit BDE-AT-4).

28  
29  
30 The Town has not developed guidelines for solar projects. Finally, the Town seeks to  
31 protect wetlands and waterways, protect wildlife habitats and other natural resources.  
32 Town Plan at page 81 (Exhibit BDE-AT-4).

33  
34 The Project complies with the Town Plan because the Town Plan encourages the  
35 development of renewable energy resources and does not contain any specific solar siting  
36 provisions or land conservation measures applicable to the proposed Project or Property.

1 The proposed Project also gives due consideration to the Town’s goal of respecting the  
2 character of the surrounding area and neighborhood views by designing the Project to  
3 include a significant setback (approximately 283 feet) from Route 2, and locating the  
4 Project in an area that contains commercial development (RV trailer business). The  
5 existing residential structures are all over 153 feet from the Project panels and the  
6 Applicant redesigned the Project to limit private views of the Project. Moreover, unlike  
7 residential subdivisions that permanently impact the land, the proposed Project has  
8 limited impacts on the land as explained in Adam Crary’s testimony, and such impacts  
9 can mostly likely be remediated once the Project is removed. As explained in the  
10 aesthetic report, the Project is well screened from public viewpoints due to the significant  
11 setback from Route 2, and the intervening structures and vegetation. Finally, the Project  
12 has proposed landscape mitigation to further limit views from Route 2 as set forth in  
13 Exhibit BDE-AT-7. Thus, the Project complies with the Town Plan.

14  
15 The Applicant also examined the 2008 Central Vermont Regional Plan (Land Use  
16 Element October 2015) (“Regional Plan”) to evaluate impacts to orderly development.<sup>1</sup>  
17 The Regional Plan does not contain specific solar siting guidelines. The Regional Plan  
18 contains general goals encouraging the use of renewable energy:

19  
20 -The use of non-renewable energy resources should be decreased while the  
21 use of renewable energy resources, particularly those of local origin,  
22 should be increased.  
23

---

<sup>1</sup> When we contacted the Regional Planning Commission, the person we spoke with explained that the October 2015 Land use section replaces the land use section in the 2008 Regional Plan.

1 -Contemporary solar technologies have proven their value in Vermont,  
2 particularly in rural areas. As the technologies improve and costs decrease,  
3 solar thermal collectors and photovoltaics (technologies which can convert  
4 sunlight to electricity) will become more competitive in the marketplace  
5 even in less remote areas. As the power source of solar technologies is  
6 inexhaustible, and solar energy neither contributes pollutants to the  
7 atmosphere nor to our reliance on foreign energy suppliers, strategies  
8 should be developed to encourage its use.  
9

10 -Fossil fuels must be replaced by renewable energy resources. As long as  
11 present patterns of energy consumption are continued, prices will rise, the  
12 nation's trade deficit will increase, pollution will continue and the potential  
13 for severe atmospheric changes will grow. Sustained economic health and  
14 avoidance of continued environmental degradation will require a dramatic  
15 shift to renewable energy resources and improved energy efficiency. This  
16 shift will require not only strong market pressure, but also creative policy  
17 initiatives.  
18

19 -CVRPC will promote the development and use of renewable sources of  
20 energy, particularly those of local origin, through public education efforts  
21 and participation in Act 250 and Section 248 hearings.  
22

23 Exhibit BDE-AT-5 (Regional Plan, Energy Section 3-8, 3-10, 3-12, 3-18).  
24

25 The Regional Plan's new land use section includes a goal to preserve the aesthetic quality  
26 of the region and contains the following relevant policies:

- 27 1. Municipalities and developers are encouraged, through design and  
28 siting of structures, to make a concerted effort to preserve access to and  
29 enjoyment of scenic views for the public.
- 30 2. Unless effectively screened, or clearly in the best interest of the general  
31 public, ridge line development or conspicuous development on locally  
32 prominent landscape features is discouraged.
- 33 3. The scale and siting of new structures should be in keeping with the  
34 surrounding landscape and architecture; however, towers should utilize  
35 stealth technology.

36 Exhibit BDE-AT-5 (Regional Plan at Land Use Section 2-41.)  
37

1 The Project complies with the Regional Plan for the same reasons it complies with the  
2 Town Plan. In addition, the Project complies with the Regional Plan because it is not  
3 sited on a ridge line or local prominent landscape feature. Moreover, the Project would  
4 increase the region's energy supply by increasing solar generation in the region with  
5 limited aesthetic and environmental impacts as the Project has undergone comprehensive  
6 aesthetic and environmental review as set forth in the aesthetic report and Adam Crary's  
7 testimony.

8  
9 The Applicant provided the Town of East Montpelier Select Board and Planning  
10 Commission and the Regional Planning Commission with a 45-day advance notice  
11 package under Rule 5.402(A). On November 16, 2015, I attended a Town of East  
12 Montpelier Select Board meeting on the Applicant's behalf to discuss the Project  
13 specifics in a public forum. At that meeting, the Applicant answered questions from the  
14 Board, the public, and from abutting landowners about technical aspects of the system  
15 being proposed, aesthetic screening measures, and impacts to the Town. I introduced TJ  
16 Boyle Associates as the aesthetic consultant for the Project and explained that the  
17 Applicant would implement all recommendations from TJ Boyle into the Project  
18 application documents. The Applicant implemented TJ Boyle's suggestions as evidenced  
19 by the proposed landscape mitigation plan in Exhibit BDE-AT-7 Landscape Mitigation  
20 Plan (Sheet L-1). Exhibit BDE-AT-6: sample 45-Day Package.<sup>2</sup>

21  

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<sup>2</sup> As required by Board Rule 5.100(C), the Applicant also sent the 45 day notice to the Secretary of the Agency of Natural Resources, the Commissioner of the Department of Public Service, the adjoining landowners, the Public Service Board and Green Mountain Power Corporation.

**Historical and Archeological Sites**

[30 V.S.A. § 248(b)(5) 10 V.S.A. § 6086(a)(8)]

1  
2  
3 Q16. Will this Project have an undue adverse effect on historic sites?

4 A16. No. Title 10, Section 6001(9) defines “historic site” as “any site, structure, district, or  
5 archeological landmark which has been officially included in the National Register of  
6 Historic Places and/or the State Register of Historic Places or which is established by  
7 testimony of the Vermont Advisory Council on Historic Preservation as being historically  
8 significant.” The Applicant reviewed the National Register of Historic Places and the  
9 State Register of Historic Places and found no listed above or below ground sites that the  
10 Project within or adjacent to the Project. The Applicant is not aware that the Vermont  
11 Advisory Council on Historic Preservation has considered the Project area significant  
12 such that it has begun the process of providing testimony to support the listing of any  
13 sites within or adjacent to the Project site as historic. If the Vermont Division for  
14 Historic Preservation (VDHP) believes that the Project may impact historic sites, the  
15 Applicant commits to discussing these issues with VDHP. To date, however, VDHP has  
16 not informed the Applicant of any issues. Therefore, the Project will not have any undue,  
17 adverse impacts on historic sites.

18  
19 **Aesthetics**

20 [30 V.S.A § 248(b)(5) & 10 V.S.A. §6086(a)(8)]

21 Q17. Please describe the Project site and surroundings.

22 A17. As fully described in the attached aesthetic report prepared by Jeremy Owens, an  
23 Associate Landscape Architect at TJ Boyle Associates, LLC, Exhibit BDE-AT-7 (which  
24 includes a landscape mitigation plan), the Project will not have an undue adverse impact

1 with respect to the aesthetics or scenic beauty of the area. The Report concluded that the  
2 proposed Project would not have an overall adverse effect on the scenic or natural beauty  
3 or aesthetics of the area. The vast majority of the surrounding area would not have views  
4 of the Project, and supplemental screening has been proposed as set forth in the landscape  
5 mitigation plan. The Project's impact to the surrounding area should not be considered  
6 adverse because:

- 7 • Site selection significantly reduces potential Project visibility from  
8 immediate and distant surrounding areas due to intervening vegetation and  
9 landform.
- 10 • Within views where Project visibility would occur, only a limited portion  
11 of the Project would be visible, and the Project profile would not be a  
12 major element in the landscape due to the low profile of the Project  
13 components and location of the proposed arrays at 90° to the direction of  
14 travel.

15 However, if the Project were found to be adverse, it would not result in an undue impact  
16 because:

- 17 • The Project includes reasonably available mitigation measures to reduce  
18 its visual impact to Route 2. Mitigating elements include site selection,  
19 locating the arrays in close proximity to adjacent vegetation and the  
20 proposed supplemental landscape mitigation.
- 21 • The Project does not violate a clearly written community standard  
22 intended to preserve the aesthetics or scenic beauty of the area based on  
23 the review of the Regional Plan and Town Plan.

- The Project would not be considered shocking or offensive to the average person due to the lack of extensive public views, supplemental landscape mitigation, and similarity to existing distribution infrastructure found throughout Vermont.

In conclusion, the Project meets the Quechee Test insofar as its impact on aesthetics would not be unduly adverse.

**Noise**  
[Section 248(b)(5)]

Q18. Please explain any potential noise impacts from the Project.

A18. The Project will use two pieces of electrical equipment that will generate noise. The first are the pole mounted step-up transformers. These transformers will meet the NEMA Standard TR-1 requirements for sound level, which states that the transformer not exceed a sound level of 55 dBa at 1 foot. The second are the string inverters. The manufacturer specifications for these inverters expect the sound level to be less than 55 dBa at 1 meter.

The sound analysis was completed for the closest existing residence to the Project. The closest existing residence is located approximately 153 feet to the south of the Project site. The sound analysis demonstrates that the sound level at the exterior of this residence will be less than 36 dBa. The next closest existing residence is located approximately 196 feet to the south of the Project site. The sound analysis demonstrates that the sound level at the exterior of this residence will be less than 35 dBa.

1 Q19. Will the noise produced by the proposed Project create an undue adverse effect?

2 A19. No, the noise levels calculated at the nearest residence will be below both the maximum  
3 limits of 45 dBa (exterior) and 30 dBa (interior) as required by the Public Service Board.  
4

5 **Waste Disposal**

6 [10 V.S.A. § 6086(a)(1)(B) & 1424a(d)(2)]

7 Q20. Will the Project require installing any components with oil?

8 A20. Yes. The Project includes installing 3 - 167 kW transformers that use a bio-based  
9 coolant. The Site Plan (Exhibit BDE-AT-2) shows the location of the proposed  
10 transformers and Exhibit BDE-AT-3 includes transformer specifications. Please see the  
11 Prefiled Testimony of Adam Crary and Exhibits for more information.  
12

13 Q21. Will the Project meet all applicable health and Department of Environmental  
14 Conservation (“DEC”) regulations regarding the disposal of wastes?

15 Q21. Yes. The Project will not involve the injection of waste materials or any harmful or toxic  
16 substances into groundwater or wells. The Project will produce minimal waste.  
17 Construction debris and waste products will be disposed of in accordance with applicable  
18 regulations and transported to an appropriately licensed facility.  
19

20 **Transportation Systems/Traffic**

21 10 V.S.A. § 6086(a)(5)

22 Q22. Will the Project cause unreasonable congestion or unsafe conditions with respect to use  
23 of the highways, waterways, railways, airports or airways, and other means of  
24 transportation existing or proposed?

1 A22. No. The Applicant proposes to deliver materials to the Project site via Route 2 and other  
2 state and local roads, which are accustomed to the type of traffic representative of the  
3 proposed daily material delivery. The Project is not expected to require overweight and  
4 oversized deliveries.

5  
6 **Development Affecting Public Investments**  
7 [10 V.S.A. § 6086(a)(9)(K)]

8 Q23. Will the Project unnecessarily or unreasonably endanger any public or quasi-public  
9 investment in the facility, service, or lands, or materially jeopardize or interfere with the  
10 function, efficiency, or safety of, or the public's use or enjoyment of or access to, the  
11 facility, service or lands?

12 A23. No. The nearby existing public investment is Route 2 and the Project will not interfere  
13 with the public's use of those roads other than through minor temporary traffic impacts.

14  
15 **Group Net-Metering Requirements**  
16 [Board Rule 5.105]

17 Q24. Please describe the meters proposed to be included in the group system?

18 A24. The new net metering group members are: (Meter #1) a new proposed meter located at  
19 the array for measuring excess production which the Applicant will own, and locate at the  
20 Project Site. The Applicant requested GMP to setup an account for the production meter  
21 once that infrastructure has been constructed. The second meter (Meter #2) is an existing  
22 meter #2674860 that is associated with Account #: 5616 52 000 9 located at 39 Main  
23 Street, Proctor, Vermont. The Applicant will allocate excess production from the array to  
24 the Green Mountain Power Customer account number # 5616 52 0000 9 (Meter #2).

1 Please note that the second meter and associated account are already proposed to be  
2 associated with another group and a different generation facility (see recently filed 500  
3 kW group net metering project for BDE Vergennes Poquette Solar, LLC). This customer  
4 and related net-metering applicants have requested Board approval to associate the  
5 second meter to that group in another matter.

6  
7 Q25. Will the meters included in the group system be located within the same electric service  
8 territory?

9 A25. Yes. All meters will be located within GMP's service territory.

10  
11 Q26. Please describe the proposed method for adding and removing meters from the group net  
12 metering system?

13 A26. Applicant will add or remove meters at its sole discretion and pursuant to applicable  
14 rules.

15  
16 Q27. Whom will Applicant designate to be responsible for all communications from the group  
17 system to the serving electric company, for receiving and paying aggregate bills for any  
18 service provide by the serving company for the group system, and for receiving any other  
19 communications regarding the group system?

20  
21 A27. Andrew Thomas  
22 Bullrock Deutsche-Eco Solar, LLC  
23 145 Pine Haven Shores Road Suite 1150  
24 Shelburne, VT 05482  
25 (802) 999-3377

1 Q28. Please describe Applicant's binding process for the resolution of any disputes within the  
2 group system relating to net metering that does not rely on the serving electric company,  
3 the Board or the Department?

4 A28. All disputes between group members will be settled by the group administrator, in its sole  
5 discretion. In no event will Applicant require the Public Service Board, the Public  
6 Service Department, or GMP to resolve a dispute within the group net metering system.

7

8 Q29. Does this conclude your testimony?

9 A29. Yes.

**EXHIBIT LIST**

Exhibit BDE-AT-1	Resume
Exhibit BDE-AT-2	Site Plans
Exhibit BDE-AT-3	Proposed Equipment Specifications
Exhibit BDE-AT-4	Town Plan Excerpts
Exhibit BDE-AT-5	Regional Plan Excerpts
Exhibit BDE-AT-6	45-day Package (sample)
Exhibit BDE-AT-7	Aesthetic Report