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April 4, 2017

Judith Whitney, Clerk
Vermont Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05620-2701

RE: CPG #16-0042-NMP – Application of Orchard Road Solar I, LLC for a certificate of public good, pursuant to 30 V.S.A. §§ 219a and 248, for a 500 KW interconnected group net-metered solar electric generation system in Middletown Springs, Vermont

Dear Ms. Whitney:

Enclosed for filing with the Board in the above referenced matter please find an original and three (3) copies of a Motion to Continue Site Visit with a Certificate of Service evidencing service of same.

Thank you for your kind assistance in this matter.

Very truly yours,

L. Brooke Dingleline, Esq.

LBD/sac

Enclosures

cc: Certificate of Service

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

CPG #16-0042-NMP

**Application of Orchard Road Solar I, LLC for a)
certificate of public good, pursuant to)
30 V.S.A. §§ 219a and 248, for a 500 kW)
interconnected group net-metered solar electric)
Generation system in Middletown Springs, Vermont)**

MOTION TO CONTINUE SITE VISIT

NOW COME Richard Spitalny, Robert & Karen Galloway, Daniel McKeen & Ellen Secord, and Neil & Thomas Russell, by and through their attorney L. Brooke Dingledine, Esq. of the firm Valsangiacomo, Detora & McQuesten, P.C. and several *pro se* neighbors (both the represented and *pro se* neighbors, hereinafter collectively referred to as “the Neighbors”) respectfully request a continuance and rescheduling of the Site Visit presently scheduled for Thursday, April 6, 2017 as follows:

1. The weather during the Site Visit on April 6, 2017 in the afternoon is predicted to be heavy downpours, considerable wind (sustained 26mph) and there is a flood watch currently in effect for Rutland County through Saturday. Besides the slippery conditions for driving and walking, visibility is of concern such that the weather may impede a satisfactory view of the Site from various vantage points.
2. The Neighbors and, upon information the belief, the Department of Public Service intend to bring their respective aesthetic experts to the Site Visit to collect data and take photographic evidence for the Technical Hearing. Such data collection and photography may be compromised with the heavy rains and high winds that are predicted for that day.
3. The Neighbors request that the Board reschedule the Site Visit to ensure a meaningful and sufficient Site view and request that the Site Visit be held on Monday April 10 starting at 11am, 12 noon or

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1pm. In the alternative, April 12, 13 or 14 is requested as previously offered.

4. Undersigned Counsel represents that she conferred in good faith with the DPS and the Applicant's attorney. Ms. Hoffman was cooperative and stated that she could work around the suggested Monday April 10th date so long as it was not too early in the day. Applicant's attorney would provide no agreement and preferred to respond to a Motion to Continue instead of stipulating to an agreed date(s) for rescheduling.

WHEREFORE, the above-referenced Neighbors respectfully request that the **Site visit be rescheduled to April 10, 12, 13, or 14** so that a proper, safe and meaningful Site Visit can occur and which permits data collection and sufficient photography to occur.

DATED at City of Barre, County of Washington and State of Vermont this 4th day of April, 2017.

Richard Spitalny, Robert & Karen Galloway,
Daniel McKeen & Ellen Secord, and Neil &
Thomas Russell



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**STATE OF VERMONT
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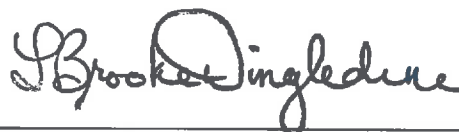
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CERTIFICATE OF SERVICE

NOW COMES L. Brooke Dingledine, Esquire, of the law firm of Valsangiacomo, Detora & McQuesten, P.C., and certifies that I forwarded my **Motion to Continue Site Visit** by electronic mail as noted on the attached Service List.

DATED at Barre, County of Washington and State of Vermont this 4th day of April, 2017.



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