



**RUTLAND REGIONAL PLANNING COMMISSION**

September 6, 2016

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

**RE: Application of Orchard Road Solar, I, LLC for a certificate of public good, pursuant to 30 V.S.A. §§219(a) and 248, to install and operate a 500 kW group net metered solar electric generation facility located on Orchard Road in Middletown Springs, Vermont.**

Dear Ms. Whitney,

The Executive Finance Committee of the Rutland Regional Planning Commission (RRPC) has reviewed The Orchard Road Solar, I, LLC CPG application to install and operate a group net metered, ground-mounted 500 kW solar electric generation facility in Middletown Springs. The Committee has made a determination that the proposed project will have a significant regional impact based on the cumulative effects of solar electric generation facility infrastructure in the region.

The RRPC will not be intervening at this time; however, is concerned that its comment letter following the 45-day notice, dated May 3, 2016, was not referenced in the application. That letter requested information on the following to be addressed in the application: neighbor outreach efforts and responses, project decommissioning plans, primary agricultural soil mitigation methods, plans for Renewable Energy Credits (RECs) generated by the project, fencing and methods of natural resource habitat protection.

After review of the application, information on the following is still outstanding:

- Initial and current efforts to mitigate concerns of the residents in proximity to the project.
- Plans for Renewable Energy Credits (REC) generated.
- Detailed project decommissioning plans.
- Evidence that this project furthers the goals of the Middletown Springs Municipal Plan.

With respect to 30 VSA §248(b)(1) – Orderly Development of the Region, the RRPC would like to note that this is one of the most rural locations in the region for a project of this size. Add to this the fact that the net metered group being served is located approximately 70 miles away; it is questionable how this criterion is being satisfied. This project would receive *zero* beneficial REC and siting pricing ‘adjustors’ under the draft Board Rule 5.100.

Finally, the application states, “Applicant has continued to work with the adjoining landowners and Town officials to maintain stakeholder involvement and answer any lingering questions.” Based on input the RRPC has received from community members, this is not the case and significant questions from residents remain.

The Opera House | 67 Merchants Row | Rutland, Vermont  
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The RRPC will consider offering support for the project when the above information is provided and issues are addressed.

Sincerely,

A handwritten signature in black ink, appearing to be "E. B.", written in a cursive style.

Executive Finance Committee,  
Rutland Regional Planning Commission

cc: Department of Public Service  
Regional Commissioner Middletown Springs - Thomas Hurcomb  
Chair Middletown Springs Planning Commission - John Arsenault  
Chair Middletown Springs Selectboard - Terry Redfield

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