

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power for a)
Certificate of Public Good pursuant to 30 V.S.A.)
§ 248(j), authorizing the installation and operation) Case No. 17-2813-PET
of a battery storage system on the GMPSolar Panton)
Project site located in Panton, Vermont, to be known)
as the “GMP Panton Battery Storage Project”)

AFFIDAVIT OF GREG DIXSON

1. My name is Greg Dixson. I am a Professional Civil Engineer for Krebs and Lansing Consulting Engineers, Inc. (“K&L”). My business address is 164 Main Street, Suite 201 in Colchester, Vermont 05446.
2. Ian Jewkes of K&L, another Professional Engineer at our company, submitted testimony in support of the Section 248 petition for Green Mountain Power’s (“GMP”) Panton Battery Storage Project (the “Project”) on April 10, 2017. I worked with Mr. Jewkes on the submission.
3. I have reviewed GMP’s proposed changes to the Project to incorporate equipment that would facilitate islanding capabilities for the Project. Specifically, I have reviewed the electrical plans and equipment specifications for the proposed additional equipment to be added to the Project. With this information from GMP, I updated the civil site plan and performed a revised sound analysis.
4. Having reviewed these proposed changes in detail, it is my conclusion that none of these changes has potential for significant impact under any of the following Section 248 criteria: soil erosion, water pollution, sound, or primary agricultural soils.

5. Soil Erosion - This revision to the Project site will result in less than ± 0.20 acres of soil disturbance. The area is shown on page C-001 of the Revised Site Plan, *Attachment 1*, referred to as the Limits of Disturbance (“LOD”). Soil disturbance activities are trenching for underground power, installation of gravel access, installation of vaults for project equipment and construction staging. There is no other active construction on the Project site at this time or planned during the time of the new equipment installation. Therefore, the total amount of disturbed soil will be well below the one-acre threshold for a construction stormwater permit. The contractor will follow the State of Vermont Low Risk Site Handbook for Erosion Preventions and Sediment Control for new equipment installation.
6. Water Pollution - The proposed equipment will be mounted on concrete vaults which will be surrounded with a small apron of gravel. The gravel apron will connect to the existing apron for the battery equipment. This additional gravel, which includes all equipment, will add $\pm 1,140$ s.f. of impervious surface to the Project site. Per the approved Project site plan, *Exhibit GMP-KS-2*, the site currently contains $\pm 41,610$ s.f. of impervious surface. Therefore, the total amount of impervious surface would increase to $\pm 42,750$ s.f. (0.98 acres). As the amount of impervious surface on the site will remain less than one acre, no construction or operation stormwater permit will be required.
7. The revision to the Project will still not require the need for water supply or water injection. The proposed transformer will include a secondary oil containment system that provides volume for 110% of the fluid capacity of the transformer and 5” of freeboard. Secondary oil containment will provide additional protection in the event of a spill. As a result, there is no potential for impact under this criterion.
8. Sound – This revision will add a 1,500 kVA transformer which will be the only proposed piece of additional equipment that generates noise when operating. The additional

transformer will not create a nominal difference during the daytime due to all the other equipment on-site producing noise. The modeled noise levels for the daytime match the last sound analysis dated March 30, 2017, and creates an approximately one dBA increase in nighttime operation. Even with the additional transformer and slight increase at night, the modeled noise levels are very low, 22 dBA at the closest resident. As a result, there is no potential for undue adverse impact.

9. Primary Agricultural Soils - The addition of the new equipment and gravel apron will require minimal disturbance of primary agricultural soils. The project revision is mapped within Vergennes Clay which is considered Statewide Prime Agricultural soil. In total, this revision will result in a very minor amount of permanently disturbed soil—approximately 0.03 acres. This soil will be removed for installation of the two vaults and 12” stone apron. There is also a chance for temporary disturbance and compaction in the remaining areas within the 0.2-acre Limits of Disturbance. Soil will be analyzed, removed and refurbished in accordance with the Vermont Agency of Agriculture, Food and Markets – Act 250 Procedure for Reclamation of Vermont Agricultural Soils. Please refer to C-003 for additional details. With these steps, there is no potential for significant impact on primary agricultural soils as a result of the added equipment.
10. For the above reasons, it is my opinion that the proposed changes to the Project are minor and do not have potential for significant or undue adverse impacts under the Section 248 criteria identified above, and do not change my prior conclusions regarding the Project’s compliance with Section 248 criteria.

I declare that the above statement is true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I may be subject to sanctions by the Commission for contempt.

Dated at COLCHESTER, Vermont this 13TH day of July, 2020.

Respondent Signature

By: 
Greg Dixson



KATELYN ESTERBY
EXP: 1/31/21