PSB received D.B. 11-28-16@3:45pm





Leslie A. Cadwell lac@lac-lca.com 802-342-3114

November 28, 2016

Judith C. Whitney, Clerk Vermont Public Service Board 112 State Street, 4th Floor Montpelier, VT 05620-2701

Re:

Docket Nos. 8571 and 8816

Dear Ms. Whitney:

Enclosed for filing in the above-referenced dockets, please find an original and 13 copies of Swanton Wind, LLC's Motion to Consolidate Related Pending Actions. A copy of this filing is being served on the parties in the respective proceedings by U.S. Mail. Copies of the service lists are also enclosed.

Thank you for your assistance and attention to this filing.

Very truly yours,

Leslié A. Cadwell

Enclosure(s)

Cc: Attached service lists

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STATE OF VERMONT PUBLIC SERVICE BOARD

Docl	Lot-	No	88	16

Petition of Swanton Wind LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, for the construction of an up to 20 MW wind-powered electric generation plant to be located in Swanton, Vermont)
and	
Docket No. 8571	
Petition of Swanton Wind, LLC for approval of Rule 4.100 power purchase agreement)

MOTION TO CONSOLIDATE RELATED PENDING ACTIONS

NOW COMES Swanton Wind, LLC, Petitioner in the above-captioned proceedings ("Related Proceedings"), by and through the undersigned counsel, and moves, pursuant to Vermont Rule of Civil Procedure 42, Public Service Board Rule 2.211, and the *Order Staying Proceedings* issued in Docket No. 8571 on December 11, 2015, to consolidate the Related Proceedings because the Board's *Order Staying Proceedings* ordered that the Board will review the proposed purchase power agreement filed in Docket No. 8571 with the Section 248 petition that is now the subject of Docket No. 8816, and because the two proceedings share common questions of law and fact concerning proposed power sales from the Swanton Wind Project.

WHEREFORE, Swanton Wind, LLC respectfully requests that the Board issue an order consolidating the two pending proceedings for the efficient adjudication of Swanton Wind's petitions.

Dated at Castleton, Vermont this 28th day of November, 2016.

SWANTON WIND, LLC

Leslie A. Cadwell

Legal Counselors & Advocates, PLC

PO Box 827

Castleton, VT 05735

lac@lac-lca.com

(802) 342-3114

Its Attorneys

STATE OF VERMONT PUBLIC SERVICE BOARD

Docket No. 8571

Petition of Swanton Wind, LLC for approval of a)
Rule 4.100 power purchase agreement)

SERVICE LIST

Aaron Kisicki, Esq. Vermont Department of Public Service 112 State Street Montpelier, VT 05620

Peter H. Zamore, Esq. Owen J. McClain, Esq. 30 Main Street PO Box 66 Burlington, VT 05402

William F. Ellis, Esq. McNeil, Leddy & Sheahan, PC 271 South Union St. Burlington, VT 05401

Joshua R. Diamond, Esq. Diamond & Robinson, PC 15 East State Street PO Box 1460 Montpelier, VT 05601-1460

Bernie D. Lambek, Esq. Zalinger Cameron & Lambek, PC 140 Main Street Montpelier, VT 05602 Patricia Richards, General Manager Washington Electric Cooperative, Inc. PO Box 8 East Montpelier, VT 05651

Victoria J. Brown, Esq. Vermont Electric Cooperative, Inc. 42 Wescom Road Johnson, VT 05656-9717

VEPP, Inc. P.O. Box 1938 1965 Depot Road Manchester Center, VT 05255

STATE OF VERMONT PUBLIC SERVICE BOARD

Docket No. 8816

Petition of Swanton Wind LLC for a certificate of)
public good, pursuant to 30 V.S.A. § 248, for the)
construction of an up to 20 MW wind-powered)
electric generation plant to be located in Swanton,	j
Vermont	j)

SERVICE LIST

Aaron Kisicki, Esq. Vermont Department of Public Service 112 State Street Montpelier, VT 05620-2601

Leslie Welts, Esq.
Vermont Agency of Natural Resources
1 National Life Drive, Davis 2
Montpelier, VT 05620-3901

Edward G. Adrian, Esq. Monaghan Safar Ducham, PLLC 156 Battery Street Burlington, VT 05401 (for Town of Swanton)

Melanie Kehne, Esq.
Office of the Attorney General
109 State Street
Montpelier, VT 05609-1001
(for Agency of Agriculture, Food &
Markets)

Cindy Ellen Hill, Esq.
144 Mead Lane
Middlebury, VT 05753
(for Intervenors Christine & Dustin Lang)

David Englander, Esq. Vermont Department of Health 108 Cherry Street – Drawer 39 PO Box 70 Burlington, VT 05402

Dale E. Azaria, Esq.
Vermont Division for Historic Preservation
1 National Life Drive
Davis Building, 6th Floor
Montpelier, VT 05620-3901