

**Filed via ePUC**

September 10th, 2021

Mrs. Judith C. Whitney  
Clerk of the Commission  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620-2701

**Re: Reply Comments in Case No. 20-2935-INV Request for Comments on whether the Harriman Reservoir proposed project qualifies as a “new hydroelectric” system.**

Dear Commissioners,

MHG Solar (“MHG”) is writing in response to the Comments of Great River Hydro, LLC (“Applicant”) with regard to the independent technical facility analysis.

MHG would simply reiterate that the two facilities in question simply could not operate independent of the existence of the dam. Without that infrastructure, neither project functions and they are thus, inextricably tied. As the Applicant themselves states, “the only infrastructure that the two facilities will share is the dam and impoundment, valve vault, maintenance roads and spillway – which infrastructure serve as the “fuel delivery” systems to the existing generation units, and is not the infrastructure that generates the power”. This is precisely the point. The existing Harriman Station and the proposed project cannot function independently, both generating facilities use the same dam to collect, store and provide the head necessary to deliver energy (in the form of pressurized water) to the hydroelectric generators which transform that energy delivered to them from potential energy to electrical energy.

Without the dam and associated infrastructure, the proposed project could not exist. Two project can not be considered independent if they can not function independently.

MHG Solar respectfully submits that these two facilities are not independent facilities and the proposed project should not be eligible for award.

Regards,



Pete Giese  
Manager  
**MHG Solar**