


Commonwealth of Virginia  
**STATE CORPORATION COMMISSION**

**DIVISION OF PUBLIC UTILITY REGULATION**

**MEMORANDUM**

180550288

SCC-DI ENR'S OFFICE  
DOCUMENT CONTROL CENTER  
2018 MAY 30 P 4: 00

DATE: May 30, 2018  
TO: Document Control Center  
FROM: Madria Barnes, Division of Public Utility Regulation   
RE: Pleinmont Solar, LLC, et al. - Joint Application for Certificates of Public Convenience and Necessity for a nominal 500 MW Solar Generating Facility in Spotsylvania County.

Attached is 1 comment submitted to the Commission for consideration. Please enter in the case jacket for Case No. PUR-2017-00162. Thank you.

Mr. A. G. Randol, III

Attachment

**NOT FOR DISTRIBUTION**

May 23, 2018

Clerk of the State Corporation Commission  
Document Control Center  
P.O. Box 2118  
Richmond, Virginia 23219-2118

SCC-CLERK'S OFFICE  
DOCUMENT CONTROL CENTER

2018 MAY 25 A 9:22

180550290

RE: **Case Number PUR-2017-00162**

Application of Pleinmont Solar LLC et al. for certificates of public convenience and necessity for a 500 MWe solar generating facility in Spotsylvania County.

These comments are submitted in lieu of testimony because I had to leave town on the day of the testimony.

The comment delay offered to sCorp needs to be extended to any public comments so that the public can respond to any erroneous information submitted to the SCC.

My concerns are:

**1. Financial responsibility for maintenance, decommissioning and remediation must be demonstrated.**

Since the Company is an LLC the financial resources of the entity are not available, the public must be indemnified by participating parties, including the power purchasers.

All owners, operators, power purchasers, and financiers of each phase of the solar facility must be parties with joint and several liability for the costs of remediation and decommissioning whether arising from abandonment, bankruptcy or end of project life before final approval is given to any of the applicants in this case.

**RECEIVED**

MAY 29 2018

Public Utility Regulation  
State Corporation Commission

1/4

The probability that a catastrophic event including fire, earthquake, tornado, or hurricane, will occur during the twenty-five year operation of the Project is substantial.

Installation, maintenance and replacement of 1.8 million cadmium-telluride panels exposes the site to toxic substances over the operating life. The Material Safety Data Sheets for the components of the solar panels need to be submitted for public review and comment. The potential for creation of a Superfund site needs to be reviewed by the U.S. Environmental Protection Agency and considered by the SCC when establishing the financial responsibility requirements.

## **2. Preservation of the drinking water supply to the citizens of Spotsylvania County must be assured.**

Several thousand drinking water wells surrounding the solar plant site could be contaminated by the extraction of water during construction, use for future operations and decommissioning. The bond for the site must include supply of water in the event of contamination in addition to restoration of the wells.

## **3. Concern about the toxicity of the solar panels needs to be addressed**

The solar panels described in the "Series 6 Datasheet" are inadequate. The cadmium telluride contained in the solar panels when installed is not the concern. Once the panels degrade and are exposed to the environment, the possibility of migration becomes a concern both to onsite workers as well as the public. The pathways for exposure include migration from the site by both groundwater movement as well as air emissions.

The environmental assessment needs to be expanded to include exposure pathways to onsite receptors (workers) as well as

offsite receptors (sensitive populations: children and those with compromised immune conditions).

#### **4. Disruption of the hydrology must be considered**

Data collected over the last 50 years indicate a continuing decrease in groundwater levels.

The proposed site is recharged by local surface water dependent on rainfall. Industrial scale water usage will result in depletion of the local area water reserves. The effects of primary concern: water levels dropping below current water well depths and collapse of localized aquifers. This degradation will have a direct impact on residential and agricultural supply requiring the county to supply water and agriculture affected. This concern renders the site unacceptable unless the financial responsibility for monitoring the condition of existing wells and providing new viable wells is included in the site permit.

The SCC should require a comprehensive study of the groundwater at the site.

#### **5. The true economics of the supply has to be evaluated and disclosed**

The true cost of electricity from the facility has to be determined on the basis of NO SUBSIDIES (Federal or State), including the effects of intermittent sunlight, the steady degradation of the efficiency of the solar panels, the cost of replacing degraded panels and the cost of the backup power from the grid. Prior analysis of solar electricity proposals by the SCC has resulted in rejection. The consumers of Virginia need to know what's in store for their electricity rates if solar generation is expanded.

Any SCC permit must require that before any public sale of electricity to the PJM grid will require an update of the costs

3/4

based on actual data and approval by the SCC prior to any sale to residential consumers.

**6. The precedent established by the facility has to be analyzed for its impact on statewide rates and transmission grid effects.**

While the facility is rated at 500 MWe, the possibility of additional installations comprising up to 5000 MWe has to be evaluated. The rate effects and the stability of the grid needs to be evaluated by the SCC before any approval.

Respectfully submitted,



A.G. Randol III, Ph.D.  
Virginia Scientists and Engineers for Energy and Environment  
Alexandria