

**BEFORE THE PUBLIC SERVICE  
COMMISSION OF MARYLAND**

IN THE MATTER OF THE APPLICATION OF \*  
ONEENERGY CAMBRIDGE SOLAR, LLC FOR \*  
A CERTIFICATE OF PUBLIC CONVENIENCE \*  
AND NECESSITY TO CONSTRUCT A 3.3 MW \*  
SOLAR PHOTOVOLTAIC GENERATING \* Case No.  
FACILITY IN DORCHESTER COUNTY, \*  
MARYLAND \*

\* \* \* \* \*

**APPLICATION OF ONEENERGY CAMBRIDGE SOLAR, LLC  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY  
AND REQUEST FOR WAIVER OF TWO-YEAR NOTICE REQUIREMENT**

OneEnergy Cambridge Solar, LLC (“OneEnergy” or “Applicant”), by its undersigned counsel, hereby submits this Application to the Public Service Commission for a Certificate of Public Convenience and Necessity (“CPCN”) to construct a nominally rated 3.3 megawatt (“MW”) solar photovoltaic facility in Dorchester County, Maryland (“Cambridge Solar Farm” or “Project”) pursuant to section 7-207 of the Public Utilities Article of the Annotated Code of Maryland.

OneEnergy’s Application is comprised of this petition together with the attached Environmental Review Document (“ERD”). Additionally, OneEnergy requests a waiver of the two-year notice requirement. Section I of this petition provides an overview of the Project; Section II justifies Commission’s approval of the application; Section III provides the information required by § 7-207; and Section IV requests waiver of the two-year requirement.

## I. PROJECT INTRODUCTION

The Cambridge Solar Farm will be a 3.3 MW alternating current (AC) solar photovoltaic (PV) project on an approximately 25-acre, privately-owned site in Dorchester County, Maryland pursuant to a long-term lease from a private landowner. The site is part of a larger, 365.32-acre, leased farm located at Bucktown Road and is approximately one (1) mile north of Indian Bone Road. Approximately twenty-five to forty (25-40) design, management, and construction personnel will work (remotely or on site) on the Project at the height of construction, which is anticipated in late 2014 subject to permitting timeframes. Because of the nature of solar installations, environmental impacts from the Project will be minimal and the long-term benefits significant.

Maryland has established one of the most aggressive renewable portfolio standard goals in the country, aiming for 20% of its power to be renewable by 2022, including 2% from solar.<sup>1</sup> In order to meet these goals Maryland needs not only small, residential rooftop installations, but large utility-scale facilities like the Cambridge Solar Farm.

In summary, there are compelling economic, environmental and legal reasons for the State and the Commission to expeditiously approve this CPCN application, with no countervailing harm. Accordingly, we ask the Commission to expeditiously approve the Project.

## II. CPCN STANDARD

When the Commission considers whether to grant a CPCN, it must take into account “the effect of the generating station, overhead transmission line, or qualified generator lead line on:

- (i) the stability and reliability of the electric system;
- (ii) economics;
- (iii) esthetics;

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<sup>1</sup> Indeed, Senate Bill 733, currently pending in the General Assembly, proposes to increase this lofty goal even further to 40% renewable power by 2025, with 4% from solar.

- (iv) historic sites;
- (v) aviation safety as determined by the Maryland Aviation Administration and the administrator of the Federal Aviation Administration;
- (vi) when applicable, air and water pollution; and
- (vii) the availability of means for the required timely disposal of wastes produced by any generating station.

Md. Code Ann., Pub. Util. ("PU") § 7-207(e)(2). The Environmental Review Document provides significant detail as to all applicable factors, but in summary each such factor weighs heavily in favor of granting OneEnergy's requested CPCN.

The Project will include significant economic benefits to the State by making more solar power and renewable energy credits available and by ensuring that approximately twenty-five to forty (25-40) temporary design, management, and construction personnel work remotely or on the site at the height of construction. *See* ERD at § 5.F (p. 22). At the same time, because the panels are low to the ground the esthetic impact to the site and surrounding area will be minimal. Additionally, buffering will be provided to prevent visibility from the closest residential properties. The Applicant completed a Determination of Eligibility form and the required attachments for the Site (D-823), which were reviewed and determined by the Maryland Historical Trust as ineligible for the National Register of Historic Places. Similarly, an Archaeological Phase I survey was conducted on the Site. Based on the documentation presented in the report, the Maryland Historical Trust noted that the project area possesses no archeological research potential and further archaeological investigations are not warranted. *See* ERD, Appendix 7.

With respect to the stability and reliability of the system, in 2012 OneEnergy initiated a process to be interconnected with the PJM Electricity Grid and Choptank Electric by filing Interconnection Requests and completing project feasibility and/or system impact assessments, which were completed in January 2013. *See* ERD at § 5.G (p. 22). It is also important to note

that the interconnection point at the Choptank Airey Substation is in the immediate vicinity of the Project, is relatively new, and has been determined to have adequate capacity to handle the proposed generation facility with minimal equipment upgrades. *Id.* Therefore, the Project should not have a negative impact on the stability or reliability of the system.

Finally, because of the nature of solar power, the Project will have no impact on aviation (because there is no stack), air or water pollution (there are no emissions or discharges) and there is no wastewater or cooling water for which disposal is required.

### **III. CPCN APPLICATION FILING REQUIREMENTS (COMAR 20.79.01.04)**

A. The applicant is OneEnergy Cambridge Solar, LLC.

B. The applicant's address is: OneEnergy Cambridge Solar, LLC, 101 Yesler Way, Suite 401, Seattle, WA 98104.

C. The following persons are authorized to receive notices and communications with respect to this Application:

Ms. Gia Clark  
OneEnergy Cambridge Solar, LLC  
c/o One Energy Renewables  
101 Yesler Way, Suite 401  
Seattle, WA 98104  
Phone (206) 922-7075  
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D. Copies of this application are being made available for public inspection and copying at:

Dorchester County Planning & Zoning Office  
501 Court Ln # 107  
Cambridge, MD 21613

E. A list of each local, state, and federal government agency having authority to approve or disapprove the construction or operation of the Project is set forth in Table 1 of the Environmental Review Document portion of this Application.

F. Other than the physical interconnection to the Choptank Airey Substation, no significant electric system upgrade to this substation will be required.

G. A general description of the generating station under COMAR 20.79.03.01 is provided in Section 5 of the Environmental Review Document.

H. Implementation schedule:<sup>2</sup>

- Engineering: Ongoing with completion by August 2014.
- Construction: Beginning Summer 2014 and ending by December 2014 to January 2015.
- Commence commercial operation shortly following construction completion.

I. OneEnergy has provided the environmental information for the generating station in section 6 of the Environmental Review Document.

#### **IV. REQUEST FOR WAIVER AND EXPEDITED REVIEW**

Although Maryland law requires the filing of CPCN applications at least two years prior to the commencement of construction, the Commission has authority to waive that notice requirement upon a showing of good cause. PU § 7-208(c). *See also* COMAR 20.79.01.07 (granting the Commission authority to “waive or modify any provision of this subtitle”). The

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<sup>2</sup> Dates are subject to change depending on delays, including those associated with permitting, equipment availability and construction.

Commission routinely grants such requests. *See, e.g.*, Case No. 9314, Order No. 85683 (May 31, 2013) (indicating grant of Church Hill Solar Farm, LLC's request for waiver); Case No. 9272, Order No. 84059 (May 26, 2011) (granting Maryland Solar LLC's request); Case No. 9199 (granting Energy Answers International, Inc.'s request).

Imposing a two-year notice requirement may make sense for certain generating facilities, but not for the type of project proposed here where impacts will not extend beyond the borders of the site. There are no emissions that will impact adjacent properties and the installation of solar cells will not materially impact property values for nearby residents. Requiring a two-year delay of the Project to satisfy this requirement would simply delay Maryland receiving the benefits offered by the Project without corresponding benefit. Accordingly, OneEnergy submits that good cause exists to support the waiver of the two-year notice requirement.

OneEnergy further requests an expeditious approval of its Application. Ideally, OneEnergy is targeting a construction start in summer 2014. OneEnergy is now investing significant capital in permitting and project design, and needs to minimize the delay before commercial operation begins. To help achieve this deadline, Applicant has engaged in pre-application outreach to the Power Plant Research Program and applicable persons and agencies and has endeavored to provide as complete an Application as possible. OneEnergy will continue to be as cooperative as possible to help the Commission review and approve this Application within this timeframe.

## V. CONCLUSION

OneEnergy respectfully requests that the Commission:

- (1) waive the two-year notice provision of Section 7-208(c) of the Public Utilities Article of the Maryland Code;

(2) expeditiously approve this Application for a Certificate of Public Convenience and Necessity for the construction of the proposed nominally rated 3.3 MW solar photovoltaic Cambridge Maryland Solar Farm in Dorchester County, Maryland.

Respectfully submitted,



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VERIFICATION

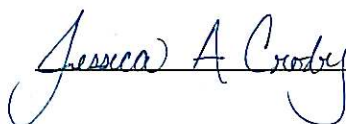
Before me, the subscriber, a Notary Public, in and for King County, Washington this day personally appeared Travis Bryan and made oath and due form of law that he is the Chief Operating Officer of OneEnergy Development, LLC, Manager of OneEnergy Cambridge Solar, LLC and the matters and facts set forth in the foregoing Application for a Certificate of Public Convenience and Necessity for the Cambridge Maryland Solar Farm are true and correct to the best of his/her information, knowledge and belief.

WITNESS my hand and Notarial Seal this 31st day of March, 2014.

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Travis J. Bryan  
Chief Operating Officer  
OneEnergy Development LLC  
Manager, OneEnergy Cambridge Solar, LLC



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Jessica A. Crosby  
Notary Public Name (Print)

My Commission Expires: 5/29/15