



**State of Vermont**

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*Agency of Natural Resources*

December 21, 2011

Susan M. Hudson, Clerk  
Vermont Public Service Board  
112 State Street  
Montpelier, VT 05620-2701

Re: Georgia Mountain Community Wind- Docket No. 7508

Dear Mrs. Hudson:

On December 16, 2011, the Public Service Board issued a memorandum requesting comments from parties in the above captioned matter on Petitioner's updated and corrected estimate for the estimated cost of decommissioning.

The cost of decommissioning and the revised cost estimate and value of the decommissioning fund has not changed since the time of the original estimate almost one year ago. The amount or estimated value is \$516,000, the same amount included in the original estimate. Although, the amount of the fund has not changed, the Board has amended the decommissioning plan to require removal of the turbine pads and Petitioner has revised its plan to include additional site restoration. It strains credulity and reason that the decommissioning costs have not increased despite the increase in the work required during decommissioning and the passage of time.

The estimated cost of decommissioning continues to be insufficient to pay for the restoration required by the Board. "The Fund should be adequately funded to ensure that the Project site returns to its pre-construction condition and reestablishes a stable forest community after the generation facility ceases to be used for commercial purposes." The decommissioning plan has allocated only \$36,000 for site restoration. This amount is insufficient to help reestablish a stable forest community after the generation facility ceases to be used for commercial purposes.

Thank you for your assistance with this matter.

Sincerely,

Judith L. Dillon, Esq.