

SAVING THE LAND THAT MATTERS MOST

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June 4, 2018

<u>Via Electronic Filing</u> Hon. Kathleen H. Burgess, Secretary New York State Board on Electric Generation Siting and the Environment 3 Empire State Plaza Albany, New York 12223-1350

RE: Case No. 17-F-0619 – Application of Hecate Energy Greene 1, LLC, Hecate Energy Greene 2 LLC, and Hecate Energy Greene 3, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 of the Public Service Law for Construction of a Solar Electric Generating Facility Located in the Town of Coxsackie, Greene County.

Dear Secretary Burgess:

Scenic Hudson, Inc. ("Scenic Hudson") respectfully submits the following request for an extension of the comment period for the Preliminary Scoping Statement ("PSS") submitted in the above-referenced proceeding.

Scenic Hudson is a 501(c)(3) organization based in Poughkeepsie, NY. Scenic Hudson preserves land and farms and creates parks that connect people to the Hudson River, while fighting threats to the river and natural resources that are the foundation of the Hudson Valley's prosperity. We have submitted requests for party status as intervenors in this proceeding. We are also following several other proceedings currently pending before the Siting Board for new, large-scale solar PV facilities proposed in the Hudson Valley.

Pursuant to the June 1, 2018, Notice of Filing of a Preliminary Scoping Statement and Deadline for Submitting Comments, the deadline for all parties to submit written comments on the PSS is Tuesday, June 19, 2018. The PSS for the proposed project, a 50 MW solar PV facility on a site consisting of 933 acres, contains nearly 300 pages of technical information and preliminary descriptions of the proposed studies necessary to assess the potential environmental and other impacts of the proposed project in the Article 10 application.

In addition to the instant proceeding, a PSS has been filed in Case 17-F-0617 – Application of Hecate Energy Albany LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 for Construction of the Coeymans Solar Farm, Albany

County. The PSS in that case, on which we also intend to provide comments, contains over 200 pages of significant technical information. The deadline for the comment period (which was longer than 21 days) in that case is Friday, June 15, 2018, only four days - including two weekend days - before the comment deadline in the instant case.

In light of the fact that these two significant documents have comment deadlines just 4 days apart, and that 21 days is not sufficient time to prepare detailed comments, we respectfully request that the deadline for submission of comments on the Greene County Solar Facility PSS in the instant proceeding be extended to July 6, 2018. We believe that this short extension request is reasonable and fair, given the relatively short time-frame for submission of comments and the level of public interest in the instant application. This additional time will allow Scenic Hudson, and likely other commenters, to prepare more robust comments that will better contribute to the record of the proceeding. Moreover, the additional time will not result in any prejudice to the parties to this proceeding, nor cause any other significant delay in the Article 10 review process.

Given the quickly approaching current deadline, we respectfully request an expedited ruling on this request by June 8, 2018.

Respectfully submitted,

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Audrey Friedrichsen, Esq., LL.M. Scenic Hudson, Inc.

cc: Party List (via e-mail) Jacqueline Bruce (via regular mail) Gabriel Wapner (contact@greenecountysolar.info)