

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Docket No. 17-5024-PET

Petition of Chelsea Solar LLC pursuant to 30 V.S.A.)
§ 248, for a certificate of public good authorizing the)
Installation and operation of the "Chelsea Solar Project,")
A 2.0 MW solar electric generation facility located off)
Willow Road in Bennington, Vermont)

**FIRST SET OF INFORMATION REQUESTS
SERVED UPON PETITIONER
BY THE DEPARTMENT OF PUBLIC SERVICE**

The Department of Public Service (the "Department" or "DPS") by: Jim Porter, Director for Public Advocacy, hereby serves the following First Set of Information Requests upon Chelsea Solar LLC ("Petitioner") in this matter in accordance with Public Utility Commission Rule 2.214 and V.R.C.P. 33 and 34, and requests that Petitioner answers the requests in accordance with V.R.C.P. 33 and 34 and deliver its answers and all requested documents and materials to the Department's offices in Montpelier not later than **May 11, 2018**. Petitioner is requested to provide two complete copies of all documents. Petitioners are also requested to provide a copy of its answers in electronic format, that is, Word or other format readable by the Department, and to provide any spreadsheets in electronic format.

INSTRUCTIONS

1. Reproduce the request being responded to before the response per V.R.C.P. 33.
2. Responses to any and all Department requests that are contained herein or that may be filed later should be supplied to the Department as soon as they become available to Petitioners. That is, Petitioner should not hold answers to any requests for which it has responsive data, documents, etc. until responses to any or all other requests are compiled.
3. V.R.C.P. 33 requires the response to each request to be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s)

of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.

4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Petitioner's workpapers and files or that is otherwise available.
5. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available to Petitioner, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.
6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
7. Some of the Department's requests may make particular reference to a portion of Petitioner's filing. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Petitiones that is responsive to the questions stated.
8. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.
9. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. All spreadsheets provided must have all formulae intact and accessible.
10. "Petition," as used herein, means Petitioner's petition filed with the Vermont Public Utility Commission in this docket, unless the context indicates otherwise.
11. With respect to each document produced by Petitioner, identify the person who prepared the document and the date on which the document was prepared.
12. If any interrogatory or request requires a response that Petitioner believes to be privileged, please state the complete legal and factual basis for the claim of privilege, provide the information required by the 5/16/95 order in Docket No. 5771 and respond to the parts of the interrogatory or request as to which no privilege is asserted.

13. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject-matter of the document as well as the complete legal and factual basis for the objection.
14. To expedite the discovery process and the resolution of this docket, Petitioner should contact the Department as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.
15. The Department reserves the right to submit additional information requests to Petitioner.

INTERROGATORIES AND REQUESTS TO PRODUCE

- Q.DPS:CS.1-1: Please refer to the prefiled testimony of Mark Kane, exhibit CS-MK-3. Please identify the visualization software and methods which were used in the development and creation of the visualizations presented on pages CS-10 through CS-29 of this exhibit. Please identify and list other cases in which the Vermont Public Utility Commission relied on visualizations of this type in making decisions on the aesthetics criterion under 30 V.S.A. § 248.
- Q.DPS:CS.1-2: Please refer to the prefiled testimony of Mark Kane found in exhibit CS-MK-2 at page 24, Q1.
Does the response to Q1 on page 24 consider the views from the project site to the North, and to the East, and does the response to Q1 consider the scenic value of views to the North and to the East?
- Q.DPS:CS.1-3: Please refer to the prefiled testimony of Mark Kane at exhibit CS-MK-3.
Please identify all utility poles along Hewitt Drive.
- Q.DPS:CS.1-4: Please refer to the prefiled testimony of Mark Kane at exhibit CS-MK-3, at page CS-03.
The Site Plan provided on page CS-03 indicates that along the western boundary of the Chelsea Solar Project, after tree clearing, there approximately 110 feet of existing woodland vegetation will remain. Please admit that this remaining tree cover will not sufficiently screen the project.
- a. If denied, please explain
 - b. If admitted, please explain why the additional mitigation tree plantings which are proposed in this area would be necessary to sufficiently screen the project.

Q.DPS:CS.1-5: Please refer to the prefiled testimony of Mark Kane, in exhibit CS-MK-2, at page 42.

Mr. Kane's testimony states "the nature of this Project, upon its decommissioning, will allow the site to be restored to an undeveloped condition." Please describe how the Applicant will restore the Project site to its natural condition, including the restoration of the forest, removal of all roads, fencing and structures, the electrical connector line, and restoring the site grading to its current natural condition.

Q.DPS:CS.1-6: Please refer to the prefiled testimony of Mark Kane, in exhibit CS-MK-2, at page 4.

Mr. Kane identifies the project site as being situated within the designated rural conservation district. Please confirm that the Town has clearly articulated standards and goals for the rural conservation district, and that the proposed project is consistent with those standards and goals.

Q.DPS:CS.1-7: Please refer to the prefiled direct testimony of Brad Wilson, dated November 27, 2017, at pages 5 and 9.

Page 5 of Mr. Wilson's direct prefiled testimony, lines 2-4, states "Solar modules are connected to a number of 'string' dc-to-ac inverters, located behind the racking rows, throughout the array". On page 12 of the same testimony, Mr. Wilson cites Exhibit CS-BW-9, which is the project's SIS. The SIS (dated 10/14/14) indicates on page 9 that four 500 kW inverters have been assumed.

a. Please confirm whether the project proposes to use string inverters, rather than four 500 kW inverters.

b. Would the use of string inverters, rather than four 500 kW inverters studied in the SIS, change any of the analyses, results, or conclusions of the SIS? Please provide a technical justification for the answer.

Q.DPS:CS.1-8: Please refer to exhibit CS-BW-9, System Impact Study.

Please admit that, in the event that the Apple Hill Solar Project (adjacent to the Chelsea Solar Project) is significantly delayed or withdrawn for any reason, Chelsea Solar LLC intends to accept responsibility for funding the planned equipment and system upgrades that are designated for common use by both solar facilities and are necessary for either or both projects to be commissioned, per the joint (Apple Hill Solar/Chelsea Solar) SIS?

a. If denied, please explain.

Q.DPS:CS.1-9: Please admit that Chelsea Solar commits to following the applicable portions of the National Electrical Safety Code (NESC) and the National Electrical Code (NEC)?

Dated at Montpelier, Vermont this 27th day of April, 2018.

VERMONT PUBLIC SERVICE DEPARTMENT

By:



James Porter, Director for Public Advocacy
112 State Street
Montpelier, Vermont 05620
(802) 828-4003
james.porter@vermont.gov

cc: Parties of Record by ePUC