



**State of Vermont
Public Utility Commission**

MEMORANDUM

To: Parties in PUC Case Number 8585

From: John J. Cotter, Esq., Hearing Officer

Handwritten initials "JC" in blue ink, enclosed in a blue circle.

Re: Request for Information

Date: July 3, 2019

On September 23, 2015, the Vermont Public Utility Commission opened this proceeding to investigate the factual circumstances and legality of the site preparation, construction, and operation of a meteorological ("MET") tower located in Irasburg, Vermont, and owned by David Blittersdorf.

Mr. Blittersdorf is requested to answer the following questions, under oath, and to file his answers with the Commission no later than July 19, 2019. These questions are being directed to Mr. Blittersdorf pursuant to the Scheduling Conference Order issued in this matter on June 26, 2019.

1. Is the MET tower that is the subject of this proceeding still erected in place?
2. If the answer to the preceding question is "no," when was the MET tower taken down? If the answer to the preceding question is "yes," is the MET tower still collecting and transmitting data on items such as wind speed and wind direction?
3. In his affidavit dated July 28, 2016, Mr. Blittersdorf states, "Prototype testing on the met tower on my Kidder Hill property is ongoing. I need long-term data, so it is important to keep running the prototype testing long term." Please provide a detailed explanation of what Mr. Blittersdorf means by the phrase "prototype testing" and his assessment of what constitute "long-term" or "long term."
4. In his prefiled testimony dated December 18, 2015, Mr. Blittersdorf states, "In the fall of 2013, I used a LIDAR unit to assess the wind above my land in Irasburg."
 - a. Was the LIDAR unit affixed or connected to the MET tower in any way? If yes, describe its location and how it was affixed or connected to the MET tower.
 - b. If no, describe the location of the LIDAR unit.

c. Did the LIDAR unit receive or send data to or from any equipment mounted on the MET tower? If yes, please identify the equipment with which the LIDAR unit exchanged data and describe the content of the data exchanged.

After Mr. Blittersdorf files his answers on July 19th, the Department of Public Service may submit any additional comments prompted by those answers no later than the close of business on August 2, 2019.

PUC Case No. 8585 - SERVICE LIST

Parties:

Leslie A. Cadwell, Esq.
Legal Counselors & Advocates, PLC
P.O. Box 827
Castleton, VT 05735
lac@lac-lca.com

(for David Blittersdorf)

Dr. Robert R. Holland
Town of Irasburg
PO Box 88
4328 Route 14
Irasburg, VT 05845
kcf.rrh@gmail.com

(for Town of Irasburg)

James Porter, Esq.
Vermont Department of Public Service
112 State St
Montpelier, VT 05620
james.porter@vermont.gov

(for Vermont Department of Public Service)

Kane Smart, Esq.
Vermont Agency of Natural Resources
1 National Life Drive, Davis 2
Montpelier, VT 05620
kane.smart@vermont.gov

(for Vermont Agency of Natural Resources)