

Q.Resp:DPS.1-1-4: For each person whom the Department expects to call as witness in Docket 8585, please state each of the following:

- a. the subject matter on which the witness is expected to testify;**
- b. the substance of the facts and opinions as to which the witness is expected to testify;**
- c. a summary of the grounds for each opinion as to which the witness is expected testify;**
- d. if the witness is an expert, identify the subject matter in which they have expertise and their qualifications to testify as to that subject matter.**

A.Resp:DPS.1-1-4 (Supplemental): Edward McNamara: (a) Will testify to explain the Department's position and provide a recommendation on remedial action pursuant to 30 V.S.A. § 30(c) criteria. (b) Will review the statements submitted by respondent, the undisputed facts of this matter, and the factors under § 30(c) to provide an appropriate, recommended civil penalty for Respondent's violation of 30 V.S.A. § 246. (c) The basis of the witness's opinion is the application of the facts in the record to the criteria found in § 30(c).

Person Responsible for Response: James Porter
Title: Director for Public Advocacy
Date: December 6, 2019