

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Investigation pursuant to 30 V.S.A. §§ 30 and)
209 into whether the petitioner initiated site) Case No. 20-1611-INV
preparation at Apple Hill in Bennington,)
Vermont, for electric generation in violation of)
30 V.S.A. § 248(a)(2))

INTERVENORS'
REPLY BRIEF

NOW COME Intervenor Apple Hill Homeowners Association (“AHHA”), Mount Anthony Country Club (MACC), and Libby Harris, by and through their attorneys of the firm Valsangiacomo, Detora & McQuesten, P.C., and hereby file this Reply Brief.

“Facts are stubborn things; and whatever may be our wishes, our inclinations, or the dictates of our passion, they cannot alter the state of facts and evidence.”

— John Adams

WHEREFORE, the PUC should issue a Permanent Injunction against Thomas Melone.

DATED AT Randolph, County of Orange and State of Vermont this 12th day of February, 2021.

APPLE HILL HOMEOWNERS ASSOCIATION,
MOUNT ANTHONY COUNTRY CLUB and
LIBBY HARRIS, Intervenor

By: /s/ L. Brooke Dingleline
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