

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No. 8585

Investigation into Meteorological Tower at 700)
Kidder Hill Road in Irasburg, Vermont)

RESPONDENT DAVID BLITTERSDORF'S ANSWERS
TO THE HEARING OFFICER'S INFORMATION REQUESTS
DATED JULY 3, 2019

- 1. Is the MET tower that is the subject of this proceeding still erected in place?**

Answer:

Yes.

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?**

Answer:

The met mast is still collecting and sending weather and other data, including wind speed and wind direction. Further details on the specific prototypes being tested on the met mast are trade secrets whose public disclosure in this proceeding would cause irreparable harm to me and put my companies at a competitive disadvantage in competitive marketplaces over which the Commission does not have jurisdiction.

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."**

Answer:

Among other things, the many companies in which I hold interest design and produce various types of electronic controllers, data gathering instruments and sensors for a number of industries/markets, including but not limited to the solar, wind, rail and heat pump industries/markets. The PUC may be most familiar with one example of such instrumentation, namely the instrumentation that can be seen on AllEarth Renewables solar trackers, which track the sun to maximize solar production. New prototype sensors and instruments for these various industries are being tested on the met mast at my property. Years of operation of prototypes are needed to produce reliable and salable products. (In this context, long-term means five (5) or more years.) The specific prototypes being tested on the met mast are trade secrets whose public disclosure in this proceeding would cause irreparable harm to me and put my companies at a competitive disadvantage in competitive marketplaces over which the Commission does not have jurisdiction.

4. In his prefiled testimony dated December 18, 2015, Mr. Blittersdorf states, "In the fall of 2013,"
- 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.

Answer:

- a. No. The LIDAR unit was standalone and does not require a support structure.
- b. The LIDAR unit was located approximately 200 feet northeast of the met mast.
- c. No.



David C. Blittersdorf

STATE OF VERMONT
COUNTY OF CHITTENDEN, SS.

On this 19th day of July 19, 2019, personally appeared David C. Blittersdorf, known to me or satisfactorily proven to be the person who is the signatory to the foregoing, and swore to the truth of the foregoing statements.

Before me,



Notary Public

My commission expires: 1/31/2021

JOYCE A. DICIANNA
Notary Public
VERMONT