

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Randolph Davis Road Solar LLC for a
Certificate of public good, pursuant to 30
V.S.A. §§ 248 and 8010, authorizing the
Installation and operation of a 500kW group
Net-metered solar electric generation system in
Randolph, Vermont

Case No. 21-2939-NMP

**MICHAEL BINDER'S RESPONSE TO PETITIONER'S
SECOND SET OF INFORMATION REQUESTS**

July 15, 2022

Q:PET:Binder.2-1: Admit that you have never prepared an application for coverage under the Vermont Department of Environmental Conservation ("DEC") Construction General Permit ("CGP") 3-9020. If denied, provide all applications.

A:PET:Binder.2-1: Admitted.

Q:PET:Binder.2-2: Admit that you have never prepared an erosion prevention and sediment control ("EPSC") plan for a Vermont construction stormwater discharge permit application.

A:PET:Binder.2-2: Admitted.

Q:PET:Binder.2-3: Is it your opinion that the project is not eligible for coverage as a Low Risk project under the DEC Construction General Permit 3-9020? If so, explain the basis of your opinion and produce all documents that support your opinion.

A:PET:Binder.2-3: I do not have an opinion on this question.

Q:PET:Binder.2-4: With respect to Exhibit MB-32, admit that you have not obtained a topographic survey of the Project site from a licensed Vermont surveyor. If denied, produce the survey.

A:PET:Binder.2-4: Admitted.

I declare that the above statement is true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated in Randolph, Vermont this 15th day of July, 2022.

A handwritten signature in cursive script, reading "Michael Binder". The signature is written in dark ink on a white background.

Michael Binder, *pro se*
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