

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Randolph Davis Solar LLC for a)
 certificate of public good pursuant to 30 V.S.A.)
 §§ 248 and 8010, authorizing installation and) 21-2939-NMP
 operation of a 500 kW (AC) photovoltaic group)
 net-metering system in Randolph, Vermont)

**PETITIONER'S LIST OF ALL PARTIES'
PREFILED TESTIMONY, EXHIBITS & AGENCY COMMENTS
(as of November 16, 2022)**

ePUC Doc. #	Date Submitted to ePUC	DOCUMENT
Petitioner's Prefiled Testimony & Exhibits		
	August 11, 2021	Prefiled Direct Testimony and Exhibits of Martha Staskus
501329/161082	August 11, 2021	Affidavit of Martha Staskus
501330/161082	August 11, 2021	Prefiled Testimony of Martha Staskus, August 8, 2021
501331/161082	August 11, 2021	Exh. RDS MS-1 Resume of Martha Staskus
	August 11, 2021 (superseded)	Exh. RDS MS-2 Site Plan prepared by Krebs & Lansing August 4, 2021 (superseded)
	August 11, 2021 (superseded)	Exh. RDS MS-3 Elevations Map (superseded)
501334/161082	August 11, 2021	Exh. RDS MS-4 Equipment Datasheets
501335/161082	August 11, 2021	Exh. RDS MS-5 Preferred Siting Letter executed by Randolph Planning Commission, Randolph Selectboard, and TRORC, June 1, 2020
501336/161082	August 11, 2021	Exh. RDS MS-6 Aesthetics and Orderly Development Report, August 8, 2021
501337/161082	August 11, 2021	Exh. RDS MS-7 Green Mountain Power Fast Track Report, April 28, 2021
501338/161082	August 11, 2021	Exh. RDS MS-8 Sound Assessment
501339/161082	August 11, 2021	Exh. RDS MS-9 Decommissioning Plan
501340/161082	August 11, 2021	Exh. RDS MS-10 Vermont Department of Historic Preservation Email, July 22, 2021

521978/161082	September 22, 2021	Exh. RDS MS-11 Green Mountain Power Feasibility Study, September 21, 2021
546634/161082	December 15, 2021	Exh. RDS A - Letter to Norwich Technologies - Acceptance of their assurance of no panels on 25% slopes
546616/161082	December 15, 2021	Exh. RDS B - Randolph Planning Commission 12-7-21 Minutes
553790/161082	February 16, 2022 (superseding August 11, 2021 version) (superseded by June 24, 2022 version)	Exh. RDS MS-2 Site Plan prepared by Krebs & Lansing (rev. 2-9-22) (superseded)
	February 25, 2022	Prefiled Supplemental Testimony and Exhibits of Martha Staskus, February 25, 2022
554962/161082	February 25, 2022	Affidavit of Martha Staskus
554975/161082	February 25, 2022	Supplemental Prefiled Testimony of Martha Staskus, February 25, 2022
554976/161082	February 25, 2022	Exh. RDS MS-2A Site Plan (rev 2/9/22 with slope layer added 2/22/22), February 9, 2021
554986/161082	February 25, 2022 (superseding August 11, 2021 version)	Exh. RDS MS-3 Elevations Map (rev. 2-22-22)
554977/161082	February 25, 2022	Exh. RDS MS-12 Engineering Letters from Krebs & Lansing and Horizons, February 9, 2021
554978/161082	February 25, 2022	Exh. RDS MS-13 Petitioner's 12/13/22 Response to Planning Commission Request
554979/161082	February 25, 2022	Exh. RDS MS-14 Planning Commission 12/14/21 Letter to Petitioner Accepting Assurances
554980/161082	February 25, 2022	Exh. RDS MS-15 Selectboard 2/10/22 Draft Minutes
557493/161082	March 16, 2022	Exh. RDS MS-16 Randolph Selectboard minutes 2022-03-03
557494/161082	March 16, 2022	Exh. RDS MS-17 Randolph Planning Commission minutes 2019-03-11

	April 19, 2022	Supplemental Affidavit and Exhibits of Martha Staskus re Slope and Tree Clearing, April 19, 2022
572451/161082	April 19, 2022	Supplemental Affidavit of Martha Staskus re Slope and Tree Clearing, April 19, 2022
572452/161082	April 19, 2022	Exh. RDS MS-2B Site Plan (rev 4-18-22) (with slopes greater than 25% within LOD)
	June 24, 2022	Prefiled Rebuttal Testimony and Exhibits of Martha Staskus
584895/161082	June 24, 2022	Affidavit of Martha Staskus
584894/16108	June 24, 2022	Rebuttal Testimony of Martha Staskus
n/a	June 24, 2022 (superseding February 16, 2022 version) (superseded by July 13, 2022 version)	Exh. RDS MS-2 Site Plan (rev 6-17-22) (superseded)
	June 30, 2022	Affidavit of Martha Staskus in Support of Request for Waiver/Minor Amendment
585914/161082	June 30, 2022	Affidavit of Martha Staskus in Support of Request for Waiver/Minor Amendment
	July 13, 2022	Affidavit and Exhibit of Martha Staskus re Revised Site Plan
587683/161082	July 13, 2022	Third Supplemental Affidavit of Martha Staskus re Site Plan
587677/161082	July 13, 2022 (superseding June 24, 2022 version)	Exh. RDS MS-2 Site Plan (rev 7-13-22)
	September 9, 2022	Prefiled Surrebuttal Testimony and Exhibits of Martha Staskus
610574/161082	September 9, 2022	Affidavit of Martha Staskus
610575/161082	September 9, 2022	Surrebuttal Testimony of Martha Staskus
610576/161082	September 9, 2022	Exh. RDS MS-18 A:PET:Binder.1-8 Admission of Michael Binder
610577/161082	September 9, 2022	Exh. RDS MS-19 A:PET:Binder.1-9 Admission of Michael Binder
610578/161082	September 9, 2022	Exh. RDS MS-20 A:PET:Binder.1-10 Admission of Michael Binder

610579/161082	September 9, 2022	Exh. RDS MS-21 A:PET:Binder.1-11 Admission of Michael Binder
610580/161082	September 9, 2022	Exh. RDS MS-22 A:PET:Allen.1-9 to 1.13 Admission of Joan Allen
610581/161082	September 9, 2022	Exh. RDS MS-23 A:PET:Allen.1-14 Admission of Joan Allen
610582/161082	September 9, 2022	Exh. RDS MS-24 A:PET:Binder.2-1 to 2-3 Admission of Michael Binder
610583/161082	September 9, 2022	Exh. RDS MS-25 A:PET:Binder.2-4 Admission of Michael Binder
	August 11, 2021	Prefiled Direct Testimony and Exhibits of Dori Barton
501347/161082	August 11, 2021	Affidavit of Dori Barton
	August 11, 2021 (superseded)	Prefiled Direct Testimony of Dori Barton
501349/161082	August 11, 2021	Exh. RDS DB-1 Resume of Dori Barton
501350/161082	August 11, 2021	Exh. RDS DB-2 Environmental Report, August 6, 2021
531144/161082	November 9, 2021 (superseding August 11, 2021 version)	Corrected Prefiled Direct Testimony of Dori Barton
	June 24, 2022	Prefiled Rebuttal Prefiled Testimony of Dori Barton, June 24, 2022
584896/161082	June 24, 2022	Affidavit of Dori Barton
584897/161082	June 24, 2022	Rebuttal Testimony of Dori Barton
	September 9, 2022	Prefiled Surrebuttal Testimony of Dori Barton, September 9, 2022
610588/161082	September 9, 2022	Affidavit of Dori Barton
610589/161082	September 9, 2022	Surrebuttal Testimony of Dori Barton
	June 24, 2022	Prefiled Rebuttal Testimony and Exhibits of Scott Homsted, June 24, 2022
584907/161082	June 24, 2022	Affidavit of Scott Homsted
584908/161082	June 24, 2022	Rebuttal Testimony of Scott Homsted

584909/161082	June 24, 2022	Exhibit RDS SWH-1 Resume of Scott W Homsted
Neighbor Intervenors Prefiled Testimony and Exhibits		
	December 14, 2021	Affidavit of Michael Binder and Joan Allen
546488/161082	December 14, 2021	Affidavit of Michael Binder and Joan Allen re 12/7/21 Randolph Planning Commission Meeting
	May 6, 2022	Prefiled Direct Testimony and Exhibits of Michael Binder*
575288/161082	May 6, 2022	Affidavit of Michael Binder
575289/161082	May 6, 2022	Prefiled Direct Testimony of Michael Binder**
575290/161082	May 6, 2022	Exhibit MB-1 Picture of Vernal Pool with Amphibian Eggs
575317/161082	May 6, 2022	Exhibit MB-3 TRORC Regional Plan
575292/161082	May 6, 2022	Exhibit MB-4 Randolph Zoning & Planning Commission 6-1-21 Meeting Minutes
620714/161082	November 14, 2022	Exhibit MB-5 Randolph Town Plan (supersedes May 6, 2022 mislabeled version)
575322/161082	May 6, 2022	Exhibit MB-6 FOIA Selectboard and Planning Commission Correspondence
575331/161082	May 6, 2022	Exhibit MB-7 Binder Letter to Selectboard 1-6-22
575294/161082	May 6, 2022	Exhibit MB-8 Picture of Access Road with Slopes
575295/161082	May 6, 2022	Exhibit MB-9 Binder Notes on Planning Commission Meeting
575296/161082	May 6, 2022	Exhibit MB-10 Binder Town Plan Criteria
575297/161082	May 6, 2022	Exhibit MB-11 Town of Randolph Conflict of Interest Policy
575298/161082	May 6, 2022	Exhibit MB-12 Binder Notes on 1-22-22 Selectboard Meeting
575299/161082	May 6, 2022	Exhibit MB-13 Binder Notes on June 2021 Randolph Selectboard Minutes

575300/161082	May 6, 2022	Exhibit MB-14 Binder Letter to Selectboard 10-21-21
575466/161082	May 6, 2022	Exhibit MB-15 Audio of December 2021 Randolph Planning Commission Meeting
575301/161082	May 6, 2022	Exhibit MB-16 Letter from Randolph Planning Commission to Binder and Allen
575323/161082	May 6, 2022	Exhibit MB-17 FOIA Selectboard and Planning Commission Correspondence
575302/161082	May 6, 2022	Exhibit MB-18 Randolph Selectboard 1-13-22 Meeting Minutes
575303/161082	May 6, 2022	Exhibit MB-19 Randolph Selectboard 2-10-22 Meeting Minutes
575304/161082	May 6, 2022	Exhibit MB-20 Petitioner's Response to Neighbor Intervenor's First Set of Information Requests
575305/161082	May 6, 2022	Exhibit MB-21 Link to video of 6-10-21 Randolph Selectboard Meeting
575306/161082	May 6, 2022	Exhibit MB-22 Link to video of 1-13-22 Randolph Selectboard Meeting
575307/161082	May 6, 2022	Exhibit MB-23 Link to video of 2-10-22 Randolph Selectboard Meeting
575308/161082	May 6, 2022	Exhibit MB-24 ANR Steep Slopes map
575309/161082	May 6, 2022	Exhibit MB-25 Civil Beat article
575310/161082	May 6, 2022	Exhibit MB-26 Randolph Planning Commission 4-12-22 Special Meeting Minutes
575327/161082	May 6, 2022	Exhibit MB-27 Binder Public Records Request
575311/161082	May 6, 2022	Exhibit MB-28 Binder Notes on 12-14-21 Planning Commission Letter
575312/161082	May 6, 2022	Exhibit MB-29 Kim Hayden email to Brendan Malley
575388/161082	May 6, 2022	Exhibit MB-30 Binder Notes on December 2021 Planning Commission Meeting
584860/161082	June 24, 2022	Affidavit of Michael Binder
	June 24, 2022	Prefiled Rebuttal Testimony and Exhibits of Michael Binder, June 24, 2022

584860/161082	June 24, 2022	Affidavit of Michael Binder
584859/161082	June 24, 2022	Rebuttal Testimony of Michael Binder
584861/161082	June 24, 2022	Exhibit MB-31 Resume of Michael Binder
584862/161082	June 24, 2022	Exhibit MB-32 Slopes on excerpt of Site Plan
584863/161082	June 24, 2022	Exhibit MB-33 Staskus email with excerpt of Site Plan
584864/161082	June 24, 2022	Exhibit MB-34 Excerpt of proposed road on Site Plans
584865/161082	June 24, 2022	Exhibit MB-35 Excerpt of Site Plan
584866/161082	June 24, 2022	Exhibit MB-36 Excerpt of Site Plan cross section
584867/161082	June 24, 2022	Exhibit MB-37 Excerpt of bend in road in Site Plan
	September 9, 2022	Prefiled Surrebuttal Testimony and Exhibits of Michael Binder, September 9, 2022
610396/161082	September 9, 2022	Affidavit of Michael Binder
610397/161082	September 9, 2022	Surrebuttal Testimony of Michael Binder
610398/161082	September 9, 2022	Exhibit MB-38 Petitioner's Response to Second Set of Information Requests
610399/161082	September 9, 2022	Exhibit MB-39 Binder slideshow A Slippery Slope
610400/161082	September 9, 2022	Exhibit MB-40 Concentrated Runoff image
610401/161082	September 9, 2022	Exhibit MB-41 PAS Stockpile image
610402/161082	September 9, 2022	Exhibit MB-42 Act 250 Procedure Reclamation Guidelines for PAS Soils
610403/161082	September 9, 2022	Exhibit MB-43 Maryland Solar Design Guidance
610404/161082	September 9, 2022	Exhibit MB-44A Pennsylvania Permitting FAQ Solar Stormwater 2019
610405/161082	September 9, 2022	Exhibit MB-44B Pennsylvania Permitting FAQ Solar Stormwater 2021
610406/161082	September 9, 2022	Exhibit MB-45 Connecticut Solar Array Guidance

610407/161082	September 9, 2022	Exhibit MB-46 Rhode Island Solar Guidance
610408/161082	September 9, 2022	Exhibit MB-47 VT DEC Solar Literature Review
610409/161082	September 9, 2022	Exhibit MB-48 Ohio Guidance Stormwater Solar Arrays
610410/161082	September 9, 2022	Exhibit MB-49 Binder notes Inadvertent Omission
610411/161082	September 9, 2022	Exhibit MB-50 Binder slideshow A Typical Road
610412/161082	September 9, 2022	Exhibit MB-51 Horizons Survey Data
610413/161082	September 9, 2022	Exhibit MB-52 VT DEC General Permit comments
610414/161082	September 9, 2022	Exhibit MB-53 Binder notes 484 points on an acre
610415/161082	September 9, 2022	Exhibit MB-54 Virginia Mercury article***
	May 6, 2022	Prefiled Direct Testimony and Exhibits of Joan Allen, May 6, 2022*
575346/161082	May 6, 2022	Affidavit of Joan Allen
575347/161082	May 6, 2022	Prefiled Direct Testimony of Joan Allen
575351/161082	May 6, 2022	Exhibit JA-1 ANR Slopes Map
575369/161082	May 6, 2022	Exhibit JA-3 Randolph Davis Soil Characteristics
575374/161082	May 6, 2022	Exhibit JA-4 VCGI Soils Map
575375/161082	May 6, 2022	Exhibit JA-5 Second Branch River Corridor Plan 2019-2021 (excerpt)*
575395/161082	May 6, 2022	Exhibit JA-8 Seeps and Vernal Pools literature
575401/161082	May 6, 2022	Exhibit JA-9 VT Dept. of Environmental Conservation Wetland Types
575402/161082	May 6, 2022	Exhibit JA-10 West Lebanon Valley News article
575411/161082	May 6, 2022	Exhibit JA-13 VT Center for Geographic Information NST Parcel Streams Map
575418/161082	May 6, 2022	Exhibit JA-15 VT Center for Ecostudies Vernal Pool Conservation Resources

575419/161082	May 6, 2022	Exhibit JA-16 World Resources Institute article
	June 24, 2022	Prefiled Rebuttal Testimony and Exhibits of Joan Allen, June 24, 2022
584883/161082	June 24, 2022	Affidavit of Joan Allen
584879/161082	June 24, 2022	Rebuttal Testimony of Joan Allen
584880/161082	June 24, 2022	Exhibit JA-17 Resume of Joan Allen
584881/161082	June 24, 2022	Exhibit JA-18 2016 Bio-Finder Update Report
584882/161082	June 24, 2022	Exhibit JA-19 Photographs of stumps damaged by black bears
	September 9, 2022	Prefiled Surrebuttal Testimony and Exhibits of Joan Allen, September 9, 2022
610343/161082	September 9, 2022	Affidavit of Joan Allen
610344/161082	September 9, 2022	Surrebuttal Testimony of Joan Allen
610345/161082	September 9, 2022	Exhibit JA-20 Birds of Conservation Concern 2021
610346/161082	September 9, 2022	Exhibit JA-21 All About Birds article***
610347/161082	September 9, 2022	Exhibit JA-22 Petitioner's Response to Second Set of Information Requests
610348/161082	September 9, 2022	Exhibit JA-23 Mapping and Conservation Guide VT Fish & Wildlife Department 2018
Agency of Agriculture, Food and Markets		
575341/161082	May 6, 2022	Affidavit of Alex DePillis
575340/161082	May 6, 2022 (superseded)	Prefiled Testimony of Alex DePillis, May 6, 2022 (superseded by September 9, 2022 Revised Comments)
Vermont State Agency Comments		
N/A	October 10, 2021	Agency of Natural Resources Comments
N/A	October 21, 2021	Vermont Department of Historic Preservation Comments
N/A	October 25, 2021 (superseded)	Agency of Agriculture, Food and Markets Comments
N/A	October 25, 2021 (superseded)	Department of Public Service Comments (superseded)

N/A	June 24, 2022	Agency of Natural Resources Comments
N/A	June 24, 2022	Department of Public Service Supplemental Comments
N/A	June 24, 2022 (superseding October 25, 2021 version)	Department of Public Service Comments Superseding October 25, 2021 Comments
N/A	July 22, 2022	Agency of Agriculture, Food and Markets Revised Comments
N/A	September 9, 2022 (superseding October 25, 2021 version)	Agency of Agriculture, Food and Markets Revised Comments (superseding October 25, 2021 Comments and Alex DePilis Prefiled Testimony)
N/A	September 9, 2022	Department of Public Service's Response to Procedural Order
N/A	September 9, 2022	Agency of Natural Resource's Updated Comments

* Exhibits MB-2, JA-2, JA-6, JA-7, JA-11, JA-12, and JA-14 are excluded as inadmissible hearsay per 6/23/22 Procedural Order.

** Page 3 Line 23 through Page 4 Line 5 is excluded as inadmissible hearsay per 6/23/22 Procedural Order.

*** Exhibits JA-21 and MB-54 are excluded as inadmissible hearsay per 10/31/22 Procedural Order.