

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-1898-PET

Petition of Essex A North Lot Solar, LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, for a 3.5 MW ground-mounted solar array located in Essex Junction, Vermont	
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**FIRST SET OF INFORMATION REQUESTS
SERVED UPON ESSEX A NORTH LOT SOLAR, LLC
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Michael Swain, hereby serves this First Set of Information Requests upon the Essex A North Lot Solar, LLC (“EANL”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that EANL answer the requests herein, conforming to Commission Rule 2.230, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier no later than **Tuesday, September 24, 2024**. Please provide EANL’s answers in electronic format (i.e. word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format.

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as EANL is able to provide an answer or production. In other words, EANL should not withhold a response to any requests for which it has responsive data, documents, etc. until EANL is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires that the response to each request is to be made under oath by a person competent to testify concerning the response, as well as all documents and exhibits produced as part of said response. When responding to each request

please state: (1) the name(s) and title(s) of the person(s) responsible for preparing the response; (2) the administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question, or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). EANL must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to EANL. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of EANL's filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

DEFINITIONS

8. "Identify," when used in reference to natural person(s) or legal entities shall be interpreted to request the full name and current business address of said person(s) or entities.

9. "EANL," as used herein, shall refer to the Essex A North Lot Solar, LLC

10. "Document," as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. "Document" shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

11. "Petition" shall mean the EANL's Petition and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

12. "FY" shall mean Fiscal Year.

13. With respect to each document produced by EANL, please identify the person who prepared the document and the date on which it was prepared.

14. If any interrogatory or request necessitates a response that EANL believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

15. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

16. To expedite the discovery process and the resolution of this case, if EANL wishes clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

17. The Department reserves the right to submit additional information requests to EANL.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.EANL.1-1. With regard to Exhibit EANL-JC-2, the Site Plan and USGS Map indicates an underground primary voltage electric line outside the perimeter fence. The prefiled testimony of Jake Clark, at 10, states: “Petitioner will own the transformer, whereas GMP will own the above referenced overhead line extension and new poles.” Please confirm whether Petitioner will own the underground primary voltage line outside the perimeter fence. If so, would Petitioner be amenable to joining DigSafe for the life of the project?

Q.DPS.EANL.1-2. With regard to Exhibit EANL-JC-6, the Facilities Report and Feasibility Study, at 14, states: “Because the Project’s capacity exceeds 1,000 kW, GMP is required to submit a generator notification form to ISO-NE per ISO-NE Planning Procedures 5-1. ISO may determine that a Proposed Plan Application (PPA) is required which may result in additional study, consistent with ISO Study and Performance Requirements in Planning Procedures 5-6 and 5-3. GMP will keep the project apprised of any updates regarding the ISO_NE review.” Please provide any updates received from GMP or ISO-NE.

Dated at Montpelier, Vermont, 3rd day of September, 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc: ePUC Service List