

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-3571-PET

Petition of Reservoir Road Solar, LLC for a	)	
certificate of public good, pursuant to 30	)	
V.S.A. § 248, to construct and operate a 2.375	)	
MW solar facility in Berkshire, Vermont	)	<i>Filed via ePUC</i>
	)	

**FIRST ROUND INFORMATION REQUESTS OF THE VERMONT AGENCY OF
NATURAL RESOURCES ON RESERVOIR ROAD SOLAR LLC**

The Vermont Agency of Natural Resources (“Agency” or “ANR”) by undersigned counsel, hereby serves the following First Set of Information Requests upon Reservoir Road Solar LLC (“Petitioner” or “RRS”) in accordance with Public Utility Commission (“Commission”) Rules 2.214 and 2.230, and requests that the Petitioner answer the requests in accordance with Commission Rules 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Agency’s offices as soon as possible but in no case later than March 14, 2025. Petitioner is requested to provide its answers in electronic format, that is, Word or another format readable by the Agency.

INSTRUCTIONS AND DEFINITIONS

1. Reproduce the request being responded to before the response. Provide one complete hard copy of your responses and an electronic copy. All spreadsheets and computer data should also be provided electronically.
2. Responses to any and all Agency requests that are contained herein or that may be filed later should be supplied to the Agency as soon as they become available to Petitioner. That is, Petitioner should not hold answers to any requests for which it does have responsive data, documents, etc., until responses to any or all other requests are compiled.
3. The response to each request should be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the

records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.

4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Petitioner's work papers and files or that is otherwise available.

5. These requests shall be deemed continuing. Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.

7. Some of the Agency's requests may make particular reference to a portion of a filing in this matter. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Petitioner that is responsive to the questions stated.

8. Documents produced pursuant to these requests shall be organized and labeled in correspondence with the paragraph number to which they are alleged to respond. With respect to each document produced by Petitioner, identify the person who prepared the document and the date on which the document was prepared.

9. If any request to admit is responded to by a denial or an objection, explain in detail the reason for such denial or objection.

10. If in response to any request for information, the responding party asserts attorney client privilege, attorney work product, or any other privilege, please provide in addition to the basis of the privilege the date of the allegedly privileged communication(s), the identity of all persons who were party to the allegedly privileged communication(s) or who received photocopies of such communication(s), and the subject matter of the allegedly privileged communication.

11. 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 it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection.

12. “Document” shall be construed as broadly as possible, and means any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. The term specifically includes and is not limited to written communications such as letters and e-mails.

13. “Identify” means:

a. With respect to a natural person with natural person(s) or legal entities other than a natural person, his or her name and present or last known business address;

b. With respect to a document, the type of document (e.g., letter, record, list, memorandum, report), date, title, contents; the person who prepared the document, and the person for whom the document was prepared, or to whom it was delivered; the persons who have possession, custody or control over the original and each copy of the document; provided however, that in lieu of identifying the document, you may attach a true and correct copy of the document to your answers; and

c. With respect to communication, where the communication occurred, e.g., if not in direct person to person conversation, the place from which each person involved actually participated; and what was said by each person involved during such communication and the order in which it was said. Identify communications in chronological order, when more than one is responsive.

14. “Information Requests” means the Interrogatories and Request for Production served on Petitioner.

15. “Person” means, but is not limited to, natural persons, partnerships, corporations, governmental agencies, boards of directors, and other legal entities.

16. “Person Responsible” means all Persons competent to testify concerning the response and all documents and exhibits produced as part of the response, with either personal knowledge about the Project and/or an expert opinion about the Project

17. “Petition” means all documents, materials, and evidence submitted by Petitioner to the PUC in Case No. 24-3571-PET.

18. “Petitioner” means Reservoir Road Solar LLC.

19. “Proceeding” refers to the PUC’s review of the Petition in Case No. 24-3571-PET.

20. “Project” means the proposed 2.375 MW ground-mounted solar array in Berkshire, Vermont, including all necessary distribution upgrades, all related infrastructure, earth disturbance, vegetation clearing, improvements to existing access roads, construction of new access roads, and all site preparation, construction, maintenance and decommissioning activities, as described in the Petition.

21. “Project Site” means the approximately 10.5-acre portion of the Property depicted in Petitioner Exhibit LBS-TH-2 within the limits of proposed clearing.

22. “Property” means the approximately 113.4-acre privately-owned parcel of land and the 87.67-acre parcel of land owned by the Village of Enosburg Falls Water & Light Department in Berkshire, Vermont that will host the Project Site.

23. “RRS” means Reservoir Road Solar LLC.

24. “PUC” means the Vermont Public Utility Commission.

25. “You” or “your” means Reservoir Road Solar LLC.

INTERROGATORIES

- Q.ANR:RRS.1-1.** Identify the Person Responsible for responding to each Information Request.
- Q.ANR:RRS.1-2.** Identify each Person consulted by the Person Responsible in responding to each Information Request.
- Q.ANR:RRS.1-3.** Identify each Person – including Person’s address – that may provide testimony in this Proceeding in Support of the Petition.
- Q.ANR:RRS.1-4.** Identify all documents Petitioner may rely on and/or offer as an exhibit in the Proceeding in Support of the Petition.
- Q.ANR:RRS.1-5.** Refer to the prefiled testimony of Stephanie Wyman dated December 4, 2024, at Page 5 of 8, lines 7-10 where Ms. Wyman states: “With respect to Project infrastructure, the Project’s transformer will be located approximately 140 feet away from an SPA at the closest point, and as described above will have a secondary containment system in the unlikely event of an oil leak,” and answer the following.
- a. Is the referenced 140-foot distance measured from the edge of zone 1 of the SPA?
 - b. Identify the distance in feet from the transformer to the nearest public water source well.
- Q.ANR:RRS.1-6.** Admit that the site plan (Exhibit RRS-SW-2) referenced in line 14 of Ms. Wyman’s above referenced testimony depicts (in pink) the boundary of zone 1 for each of the groundwater source protection areas at the project site.
- Q.ANR:RRS.1-7.** Admit that the proposed pad mounted transformer will be located in zone 2 of the SPA.

REQUESTS TO PRODUCTION

- RTP.ANR:RRS.1-1.** Produce any and all documents identified, referenced, relied upon, or referred to in responding to these interrogatories and requests to admit.

DATED this 21st day of February 2025 at Waterbury, Vermont.

Respectfully submitted,

VERMONT AGENCY OF NATURAL RESOURCES



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