

**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	
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**FIRST SET OF INFORMATION REQUESTS
SERVED UPON RESERVOIR ROAD SOLAR
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department”), by its counsel, Matthew Bakerpoole, hereby serves this First Set of Information Requests upon Reservoir Road Solar, LLC (“RRS”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that RRS answer the requests herein, conforming to Commission Rule 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Department no later than **Friday, March 14, 2025**. Please provide RRS’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 (i.e. Excel spreadsheet).

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 RRS is able to provide an answer or production. In other words, RRS should not withhold a response to any requests for which it has responsive data, documents, etc. until RRS is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires the response to each request 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 the 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). RRS must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to RRS. 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 RRS filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

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

9. If any interrogatory or request necessitates a response that RRS 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.

10. 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.

11. To expedite the discovery process and the resolution of this case, if RRS 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.

12. The Department reserves the right to submit additional information requests to RRS.

DEFINITIONS

13. “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.

14. “RRS” as used herein, means the Reservoir Road Solar, LLC..

15. “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.

16. “Petition,” as used herein, means RRS’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.

17. “FY,” as used herein, means Fiscal Year.

18. “Department,” as used herein, means the Vermont Department of Public Service.

INTERROGATORIES AND REQUESTS TO PRODUCE

System Impact Study

Q.DPS.RRS.1-1. The system impact study (Exhibit RRS-SC-5) left some items unresolved in the Conclusions and Recommendations section. Please provide a status update on the following:

- a) “Verify with the transmission company [Vermont Electric Cooperative, Inc.] (VEC) that their meter is capable of bi-directional operation. Note they may have additional requirements to accommodate this installation as an affected system.”
- b) “Review 46 kV equipment ratings and insulation coordination to determine if mitigation is required.” (Transmission ground fault overvoltage (“TGFOV”)).
- c) Has RRS decided whether to proceed with Additional System Improvements Option 1 or Option 2? If so, please explain. If not, please explain when this decision will be made.
- d) Has a facilities study been completed? If so, please provide a copy. If not, please explain if/when it will be completed.

Dated at Montpelier, Vermont this 21st day of February, 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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