

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Reservoir Road Solar, LLC, for a)
Certificate of Public Good, pursuant to 30 V.S.A. §)
248, to construct, own, and operate a 2.375 MW)
ground-mounted solar electric generation facility in)
Berkshire, Vermont)
)

Case No. 24-3571-PET

**VERMONT AGENCY OF AGRICULTURE, FOOD AND MARKETS'
FIRST SET OF INTERROGATORIES AND
AND REQUESTS TO PRODUCE UPON PETITIONER**

The Vermont Agency of Agriculture, Food and Markets (AAFM), by and through counsel, pursuant to Public Utility Commission Rule 2.214 and V.R.C.P. 33 and 34, serves the following discovery requests upon Reservoir Road Solar, LLC (Petitioner).

DEFINITIONS

For purposes of these Interrogatories and Requests to Produce, the following definitions shall apply in conjunction with the terms' ordinary meanings:

“**Describe**” means provide a detailed narrative account and description, with or without reference to one or more plans or other documents.

“**Document**” means any and all records of every type in your actual or constructive possession, control or custody, including without limitation, all electronically stored information, writings, memoranda, correspondence, letters, reports, surveys, notes, diaries, log sheets, ledgers, transcripts, microfilm, computer printouts, emails, work papers, engineering diagrams, mechanical or electrical recordings, data, video tapes, audio tapes, telephone and telegraphic communications, and all other records, written, electrical, mechanical or otherwise, as covered by V.R.C.P. 34(a).

“Explain” means provide a detailed narrative account and justification, with or without reference to one or more plans or other documents.

“Identify” when used in connection to areas of land means provide the location of the area, in relation to the Vermont Agency of Natural Resources Atlas and the site plan(s), and the size of the area in acres.

“Petitioner” means Reservoir Road Solar, LLC.

“Project” refers to the project that is the subject of this proceeding, Public Utility Commission Case No. 24-3571-PET, regarding the construction, ownership, and operation of a 2.375 MW ground-mounted solar electric generation facility in Berkshire, Vermont.

“You” or **“Your”** refers to Reservoir Road Solar, LLC

INTERROGATORIES

1. Identify and describe any areas within the limits of work that are not mapped as primary agricultural soils (PAS) by the Natural Resources Conservation Service of the U.S. Department of Agriculture (NRCS) but are currently used or have been used recently for agricultural activities, within the definition of 10 V.S.A. § 6001(15)(B).
2. Identify and describe each impact of the Project on the soils identified in response to Question 1.
3. Exhibit RRS-SW-3 at page 3 states “Of the approximately 14.8 acres within the Project limits of disturbance, approximately 14.5 acres are undisturbed mapped Prime Agricultural Soils (‘PAS’).”
 - a. Identify and describe disturbed acres of PAS that the NRCS has identified and determined to have a rating of prime, statewide, or local importance.

- b. Explain your basis for determining that each of these areas is disturbed.
4. For the imported material depicted in Exhibit RRS-SC-2 in the drawing of a utility trench at sheet C5.03, explain how this imported material factors into the proposed mitigation for temporary disturbance from trenching described in Exhibit RRS-SW-3 at 7, where imported material is not mentioned.
 - a. Please explain whether “approved native fill with no rocks greater than 4” diameter” depicted the utility trench detail on sheet C5.03 of Exhibit RRS-SC-2 is or is not PAS.
 - b. Please explain whether “conduit bedding” depicted in the utility trench detail on sheet C5.03 of Exhibit RRS-SC-2 is or is not PAS.
5. Describe the source of the topsoil proposed for the simple disconnection practices shown in the Simple Disconnection detail of Exhibit RRS-SC-2 at C5.03.
6. Describe the proposed final location of the topsoil referenced in Question 5 when the project is decommissioned.

REQUESTS TO PRODUCE

1. Please produce each document that you identified or cited in your responses to these interrogatories.
2. Please produce each document that otherwise supports your responses to these interrogatories.
3. Please produce each additional document that is otherwise responsive to these interrogatories, including any you referred to or relied upon in responding to these interrogatories.

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

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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