

Petition of VT Real Estate Holdings 2 LLC (“Fair Haven Solar”) for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 20 MW solar electric generation facility off Airport Road in Fair Haven, Vermont to be known as the “Fair Haven Solar Project”

Case No. 24-2945-PET

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 VT Real Estate Holdings 2 LLC (“Fair Haven Solar”) (Petitioner).

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 VT Real Estate Holdings 2 LLC (“Fair Haven Solar”).

“**Project**” refers to the project that is the subject of this proceeding, Public Utility Commission Case No. 24-2945-PET, regarding the construction, ownership, and operation of a 20 MW ground-mounted solar electric generation facility in Fair Haven, Vermont.

“**You**” or “**Your**” refers to VT Real Estate Holdings 2 LLC (“Fair Haven Solar”).

INTERROGATORIES

1. Identify and describe any areas of the project that are not mapped as primary agricultural soils (PAS) by the United States Department of Agriculture Natural Resources Conservation Service (NRCS) but are currently used or have been used recently for agricultural activities, within the definition of 10 V.S.A. § 6001(15)(B).
 - a. For the areas identified in response to Question 1:
 - i. Identify and describe any and all soils that will be impacted by the Project, including but not limited to the solar panels and their associated structures, wiring, and energy-conversion equipment, areas impacted by the transmission infrastructure, and aesthetic mitigation plantings.

- ii. Identify and describe each impact of the Project on the soils identified in response to Question 1.a.i.
2. Identify the width of the top of the utility trench and the width of the utility trench at the approximate depth of the conduit. Exhibit FHS-SW-2c Drawing C7.24.
3. Describe the approved native fill and the area of fill below the warning tape in the utility trench and their relationship, if any, to PAS. Exhibit FHS-SW-2c Drawing C7.24.

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.
4. Please produce any documents you relied upon to answer Question 1.

Dated at Montpelier, Vermont this 24th day of March 2025.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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