

**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

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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. Please describe the material of which the Fiber Roll is composed, where it is to be installed on PAS. See Exhibit RRS-SC-2, Sheet C5.02, Detail “Staked Fiber Roll.”
2. Please describe the material of which the Silt Fence is composed, where it is to be installed on PAS. See Exhibit RRS-SC-2, Sheet C5.02, Detail “Silt Fence/ Reinforced Silt Fence Barrier.”
3. In the areas PAS where either the Staked Fiber Roll or the Silt Fence will be installed, will you remove those materials from the PAS? If yes, please explain:
 - a. At what point in the process of the project’s installation and operation will you remove the Staked Fiber Roll?
 - b. At what point in the process of the project’s installation and operation will you remove the Silt Fence?

4. If there are any areas of PAS in which you will not remove either the Staked Fiber Roll or Silt Fence, please describe how long the materials will remain in the PAS.
5. Please describe the process you use to remove rocks to achieve “approved native fill with no rocks greater than 4” diameter” as depicted in the utility trench detail on sheet C5.03 of Exhibit RRS-SC-2.
6. Please explain what you will do with these rocks after you remove the rocks greater than 4” diameter.

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 11th day of April, 2025.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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