

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

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	)	Case No. 24-2945-PET
generation facility off Airport Road in Fair Haven,	)	
Vermont to be known as the “Fair Haven Solar	)	
Project”	)	

**VERMONT AGENCY OF AGRICULTURE, FOOD AND MARKETS’
SECOND 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 VT Real Estate Holdings 2 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. 24-2945-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.

INTERROGATORIES

1. With reference to the drawings in Exhibit FHS-SW-2b which contain the terms “receiving pit” and “jack and bore,” and referring also to the statement “Temporary impacts will also occur for the horizontal directional drill and jack and bore underground electrical installations in the form of receiving pits.” in Exhibit FHS-SW-4 at 4:
 - a. Please describe and identify the dimensions of each of the receiving pits and the total number of receiving pits.
 - b. Please describe the construction activities closely associated with these features.
 - c. Please explain the construction activities and any activity during the operation of the project within areas surrounding these features.

In your answer, please provide any drawings, dimensions, and other references that would help assess and identify the potential impact to PAS related to these features.

2. With reference to Exhibit FHS-SW-4 at 4, please describe the area that constitutes “the shared substation access road and associated stormwater treatment practices would not be subject to decommissioning and would remain in place until such a time that the GMP Substation is decommissioned,” and identify the total acres of that area.
3. Please identify the total acres of PAS within the limits of disturbance that will be permanently impacted and not subject to decommissioning.
4. Please describe whether there is or is not any PAS within the project limits of disturbance, which may have lost its agricultural potential due to impacts to the soils relevant to the agricultural potential of the soil from previously constructed improvements. Please identify the total acreage, if any, of prior impacts.

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 16th day of May 2025.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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