

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of ER Dunsmore, LLC for a Certificate of
Public Good pursuant to 30 V.S.A. § 248,
authorizing the installation and operation of a 4.95
MW solar electric generation facility off Dunsmore
Road in the Town of St. Albans, Vermont

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Case No. 25-0895-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 ER Dunsmore, 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 ER Dunsmore, LLC.

“Project” refers to the project that is the subject of this proceeding, Public Utility Commission Case No. 25-0895-PET, regarding the construction, ownership, and operation of a 4.95 MW ground-mounted solar electric generation facility in Saint Albans Town, Vermont.

“You” or **“Your”** refers to ER Dunsmore, LLC

INTERROGATORIES

1. Regarding the gravel wetland shown on the site plan (Exhibit DRS-TK-2) and mentioned in the prefiled testimony of Taegen Kopfler at 5 and with reference to the Decommissioning Plan (Exhibit DRS-TK-7), please explain whether you propose to decommission the gravel wetland, including the stormwater improvements associated with it, and, if you propose to decommission it, please describe the decommissioning process for it and explain and document how you have included the cost of decommissioning it.
2. Identify, using the above definition of “identify,” and describe any areas of the project that are not mapped as primary agricultural soils by the USDA Natural Resources Conservation Service but are currently used or have been used recently for agricultural activities, within the definition of 10 V.S.A. § 6001(15)(B).
3. Regarding your proposal in the prefiled testimony of Stephanie Wyman at 6 to use soil from excavations as fill:

- a. Please explain whether the proposed decommissioning activities will include restoring all topographical contours to the original elevations with approximately the same depth of soil layers in their original sequence of layers, and if so,
- i. Please explain and describe the process you propose to use to accomplish this restoration.
 - ii. Please explain whether you have used this technique in previous projects and please describe and document any significant difference(s) in how you restored those areas and how you propose to accomplish this type of restoration in this Project.

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 27th day of June 2025.

By: /s/ WillyJane Patry
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