

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-0895-PET

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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FIRST SET OF INFORMATION REQUESTS
SERVED UPON ER DUNSMORE, LLC
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Henry Mauck, hereby serve this First Set of Information Requests on ER Dunsmore, LLC (“ER Dunsmore” or “ERD” or “Petitioner”), in accordance with Vermont Public Utility Commission (“Commission” or “PUC”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that ER Dunsmore answer the requests herein, conforming to Commission Rule 2.230, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier no later than July 23, 2025. Please provide ER Dunsmore’s answers in electronic format (i.e. word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format.

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as ERD is able to provide an answer or production. In other words, ERD should not withhold a response to any requests for which it has responsive data, documents, etc. until ERD is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires that the response to each request is to be made under oath by a person competent to testify concerning the response, as well as all documents

and exhibits produced as part of said response. When responding to each request please state: (1) the name(s) and title(s) of the person(s) responsible for preparing the response; (2) the administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question, or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). ERD must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to ERD. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of ERD's filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

8. With respect to each document produced by ERD, please identify the person who prepared the document and the date on which it was prepared.

9. If any interrogatory or request necessitates a response that ERD believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

10. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

11. To expedite the discovery process and the resolution of this case, if ERD wishes to have clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

12. The Department reserves the right to submit additional information requests to ERD.

DEFINITIONS

13. “ERD,” as used herein, shall refer to ER Dunsmore, LLC.

14. “Petition” shall mean ERD’s Petition and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

15. “GMP” shall mean Green Mountain Power Corporation.

**FIRST SET OF INTERROGATORIES AND REQUESTS TO PRODUCE SERVED
UPON ER DUNSMORE, LLC**

Q.DPS.ERD.1-1. Please describe any further communications with the town of St. Albans or the Regional Planning Commission not already described in the Petition.

- a. Has either entity expressed opinions on the project that the Petitioner is aware of?

Q.DPS.ERD.1-2. Has a contract with GMP been finalized? If so, please provide a copy.

- a. If a contract with GMP is not agreed to,
1. Will the project still be constructed?
 2. How will the products from the facility be sold?
 3. At what price will the products be sold?

Q.DPS.ERD.1-3. Is the project located within the Sheffield Highgate Export Interface?

- a. If yes, will the project pay a generation constraints fee?

DATED at Montpelier, Vermont this 2nd day of July 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc: ePUC Service List