

**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

INTERROGATORY

Regarding your proposal in the prefiled testimony of Stephanie Wyman at 6 to use soil from excavations as fill, and referring also to Exhibit DRS-SW-3 at 1 (changes to the existing access road), at 2 (alignment of access road with drainage improvements), and at 5 (the use of fill from excavations) please identify, using the above definition of that word, the area of grading in which you propose to use fill. Please provide both the approximate acreages and the approximate volumes of such fill.

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 8th day of August 2025.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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