

1. Reproduce the request being responded to before the response. Provide one complete hard copy of your responses and an electronic copy. All spreadsheets and computer data should also be provided electronically.
 2. Responses to any and all Agency requests that are contained herein or that may be filed later should be supplied to the Agency as soon as they become available to Petitioner. That is, Petitioner should not hold answers to any requests for which it does have responsive data, documents, etc., until responses to any or all other requests are compiled.
 3. The response to each request should be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response.
- With respect to each request, please state (1) the name(s) and title(s) of the person or persons

responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.

4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Petitioner's work papers and files or that is otherwise available.

5. These requests shall be deemed continuing. Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.

7. Some of the Agency's requests may make particular reference to a portion of a filing in this matter. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Petitioner that is responsive to the questions stated.

8. Documents produced pursuant to these requests shall be organized and labeled in correspondence with the paragraph number to which they are alleged to respond. With respect to each document produced by Petitioner, identify the person who prepared the document and the date on which the document was prepared.

9. If any request to admit is responded to by a denial or an objection, explain in detail the reason for such denial or objection.

10. If in response to any request for information, the responding party asserts attorney client privilege, attorney work product, or any other privilege, please provide in addition to the basis of the privilege the date of the allegedly privileged communication(s), the identity of all persons who were party to the allegedly privileged communication(s) or who received

photocopies of such communication(s), and the subject matter of the allegedly privileged communication.

11. 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 it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection.

12. “Document” shall be construed as broadly as possible, and means any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. The term specifically includes and is not limited to written communications such as letters and e-mails.

13. “Identify” means:

a. With respect to a natural person with natural person(s) or legal entities other than a natural person, his or her name and present or last known business address;

b. With respect to a document, the type of document (e.g., letter, record, list, memorandum, report), date, title, contents; the person who prepared the document, and the person for whom the document was prepared, or to whom it was delivered; the persons who have possession, custody or control over the original and each copy of the document; provided however, that in lieu of identifying the document, you may attach a true and correct copy of the document to your answers; and

c. With respect to communication, where the communication occurred, e.g., if not in direct person to person conversation, the place from which each person involved actually participated; and what was said by each person involved during such communication and the order in which it was said. Identify communications in chronological order, when more than one is responsive.

14. “Information Requests” means the Interrogatories and Request for Production served on Petitioner.

15. “Person” means, but is not limited to, natural persons, partnerships, corporations, governmental agencies, boards of directors, and other legal entities.

16. “Person Responsible” means all Persons competent to testify concerning the response and all documents and exhibits produced as part of the response, with either personal knowledge about the Project and/or an expert opinion about the Project

17. “Petition” means all documents, materials, and evidence submitted by Petitioner to the PUC in Case No. 25-2356-PET.

18. “Petitioner” means Williston G Katie Lane Solar, LLC.

19. “Proceeding” refers to the PUC’s review of the Petition in Case No. 25-2356-PET.

20. “Project” means the construction and operation of a 2.9-megawatt ground-mounted solar array off Mountain View Road in Williston, Vermont, as described in the Petition, including all required distribution upgrades.

21. “Project Site” means the approximately eleven-acre portion of the 440-acre parcel of land depicted in Petitioner Exhibit WGKL-JC-2 within the limits of proposed disturbance.

22. “Property” means the approximately 440-acre parcel of land in Williston, Vermont that will host the Project Site.

23. “WGKL” means Williston G Katie Lane Solar, LLC.

24. “PUC” means the Vermont Public Utility Commission.

25. “You” or “Your” means Williston G Katie Lane Solar, LLC.

INTERROGATORIES

- Q.ANR:WGKL.1-1.** Identify the Person responsible for responding to each Information Request.
- Q.ANR:WGKL.1-2.** Identify each Person consulted by the Person responsible in responding to each Information Request.
- Q.ANR:WGKL.1-3.** Identify each Person – including Person’s address – that may provide testimony in this Proceeding in support of the Petition.
- Q.ANR:WGKL.1-4.** Identify all documents Petitioner may rely on and/or offer as an exhibit in the Proceeding in support of the Petition.
- Q.ANR:WGKL.1-5.** Refer to Exhibit WGKL-AC-2 (VHB Natural Resources Assessment), page 6, which states “no tree clearing in riparian buffers is proposed except for the potential for one single American elm (*Ulmus americana*) tree to be trimmed or cut, if trimming is not sufficient for construction.” When will you know if trimming is not sufficient for construction?
- Q.ANR:WGKL.1-6.** Identify all equipment that you anticipate utilizing to trim the tree if only trimming will occur and the manner and location where the equipment will be operated.
- Q.ANR:WGKL.1-7.** Identify all equipment that you anticipate utilizing to cut (i.e., remove) the tree if cutting is necessary and the manner and location where the equipment will be operated.
- Q.ANR:WGKL.1-8.** The same Exhibit states that “temporary construction measures such as erosion prevention and sediment control” will also occur within the riparian buffer. Identify all “temporary construction measures” that will occur within the riparian buffer.
- Q.ANR:WGKL.1-9.** If you are unable at this time to identify all measures that will occur, identify all those that may occur (in addition to those you know will occur).
- Q.ANR:WGKL.1-10.** When do you intend to submit a wetland permit application to the Vermont DEC for this Project?
- Q.ANR:WGKL.1-11.** Please confirm whether the approximately 1,100-foot 3-phase overhead line extension referenced on page 2 of Exhibit WGKL-JC-6 (Feasibility Study) is depicted on the Project site plan (Exhibit WGKL-JC-2). If it is not, identify specifically where it will be located and depict it on the Project site plan if applicable.

Q.ANR:WGKL.1-12. Has this line extension been evaluated for potential impacts to natural resources? If yes, provide the results. If not, explain why not.

Q.ANR:WGKL.1-13. Please confirm whether the 25 feet of reconductoring between taglet 57103 and 737369 referenced on page 2 of Exhibit WGKL-JC-6 (Feasibility Study) is depicted on the Project site plan (Exhibit WGKL-JC-2). If it is not, identify specifically where it will be located and depict it on the Project site plan if applicable.

Q.ANR:WGKL.1-14. Has this reconductoring been evaluated for potential impacts to natural resources? If yes, provide the results. If not, explain why not.

Q.ANR:WGKL.1-15. Conclusion #8 in the Feasibility Study states that “[t]he Project must also wait for the upgrades identified in: QP 702 Williston F Mountain View Solar LLC to be completed or opt to complete those upgrades as part of this Project.” If this Project is approved by the Commission prior to any approval of the Williston F project (or if the Williston F project is unable to proceed for any reason), do you intend to have the referenced upgrades completed as part of this Project?

Q.ANR:WGKL.1-16. Have the referenced (Williston F) upgrades been assessed for potential impacts to natural resources? If yes, provide the results. If not, explain why not.

Q.ANR:WGKL.1-17. Identify where the referenced (Williston F) upgrades will be located and provide a map which depicts the location and all natural resources in that area.

Q.ANR:WGKL.1-18. The Feasibility Study, at page 12, identifies approximately 2,600 feet of reconductoring that is required before the Project can interconnect, but states that this work is “GMP or other project’s responsibility.” If this is the responsibility of some other project, identify that project.

Q.ANR:WGKL.1-19. Exhibit WGKL-AC-2, at page 2, states: “[t]he Project will interconnect with the distribution system at the same location used formerly used by the RTC Project. *Distribution line upgrades are not necessary.*” The italicized statement appears to be inconsistent with the contents and conclusions of the Feasibility Study and Jake Clark’s September 30, 2025, testimony at page 16, lines 1-5, which concludes with the statement that the Project can move forward “provided that the following upgrades are installed before operation of the project.” Explain the discrepancy.

REQUESTS TO PRODUCE

RTP.ANR:WGKL.1-1. Produce any and all documents identified, referenced, relied upon, or referred to in responding to these interrogatories and requests to admit.

DATED this 11th day of December 2025 at Waterbury, Vermont.

Respectfully submitted,

VERMONT AGENCY OF NATURAL RESOURCES

A handwritten signature in blue ink, consisting of a large, stylized 'D' followed by a horizontal line extending to the right.

By: _____

Donald J. Einhorn, Esq.
Vermont Agency of Natural Resources
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