

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-2356-PET

Petition of Williston G Katie Lane Solar, LLC requesting a certificate of public good, pursuant to 30 V.S.A. § 248, for a 2.9 MW ground-mounted solar array in Williston, Vermont	
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FIRST SET OF INFORMATION REQUESTS SERVED UPON
WILLISTON G KATIE LANE SOLAR, LLC
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Matthew Bakerpoole, hereby serves this First Set of Information Requests upon Williston G Katie Lane Solar, LLC (“Petitioner”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that Petitioner answer the requests herein, conforming to Commission Rule 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier pursuant to the Scheduling Conference Order issued in this docket on December 8, 2025. Please provide Petitioner’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 Petitioner is able to provide an answer or production. In other words, Petitioner should not withhold a response to any requests for which it has responsive data, documents, etc. until Petitioner is able to fully answer all pending requests when a reply is forthcoming for some questions.

3. Commission Rule 2.230(M)(3) requires the response to each request 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 the response. When responding to each request please state: (1) the 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). Petitioner must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to Petitioner. 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 Petitioner'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 Petitioner, 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 Petitioner 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 Petitioner wishes 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 Petitioner.

DEFINITIONS

1. “Identify,” when used in reference to natural person(s) or legal entities shall be interpreted to request the full name and current business address of said person(s) or entities.
2. “Petitioner” as used herein, means Williston G Katie Lane Solar, LLC.
3. “Department,” as used herein, means the Vermont Department of Public Service.
4. “Document,” as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. “Document” shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.PET.1-1. Please list the DC/AC ratio, the expected capacity factor, and the corresponding annual output of the project.

Q.DPS.PET.1-2. Will any voltage control capabilities of the inverters be enabled to maintain a voltage setpoint at the point of interconnection, or fixed or variable reactive power output? Please explain.

Q.DPS.PET.1-3. The prefiled testimony of Jake Clark, at 7-8, states: “Electricity will then run underground to a 1600 kVA pad-mounted transformer with secondary oil containment for the northern sub-array, and a 1400 kVA 1 pad-mounted transformer with secondary oil containment for the southern sub-array. From the northern sub-array, the project proposes to install 9 new overhead poles with wires on the Global Foundries property originating at the access gate of the northern sub-array and then extending to the south along the access road to the southern sub-array, proximal to the transformer and equipment pad for the southern sub-array. From this point, the interconnection will transition to underground electric, crossing underneath the access road to the western side of the access, and connecting to existing GMP-owned distribution poles near the access road’s intersection with Mountain View Road. This is the point of interconnection with GMP.” There are several segments of underground primary voltage electric lines outside the perimeter fence between the northern sub-array and Mountain View Road. Please explain who will own these segments of underground lines.

Q.DPS.PET.1-4. Will pollinator-friendly plants be included in the implementation of the vegetation plan for project? If not, why not?

VERMONT DEPARTMENT OF PUBLIC SERVICE

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