

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-2356-PET

Petition of Williston G Katie Lane Solar,	)	
LLC for a certificate of public good in accordance	)	
with 30 V.S.A. § 248 regarding a proposed 2.9	)	<i>Filed via ePUC</i>
MW ground-mounted solar array located off	)	
Mountain View Road in Williston, Vermont	)	

**SECOND ROUND INFORMATION REQUESTS OF
THE VERMONT AGENCY OF NATURAL RESOURCES
ON WILLISTON G KATIE LANE SOLAR, LLC**

The Vermont Agency of Natural Resources (“Agency” or “ANR”) by undersigned counsel, hereby serves the following Second Set of Information Requests upon Williston G Katie Lane Solar, LLC (“Petitioner”) in accordance with Public Utility Commission Rule 2.214 and V.R.C.P. 33, 34, and 36, and requests that the Petitioner answer the requests in accordance with V.R.C.P. 33, 34 and 36, and deliver its answers and all requested documents and materials to the Agency’s offices as soon as possible but in no case later than **February 10, 2026**. Petitioner is requested to provide its answers in electronic format, that is, Word or another format readable by the Agency.

INSTRUCTIONS AND DEFINITIONS

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.2-1. Identify the Person responsible for responding to each Information Request.

Q.ANR:WGKL.2-2. Identify each Person consulted by the Person responsible in responding to each Information Request.

Q.ANR:WGKL.2-3. Refer to your response to **Q.ANR:WGKL.1-16**, where you indicate that you understand that “GMP will plan to review the 1,400-foot segment to determine whether it will need to add poles, and to stake any new or revised pole locations if necessary.” To your knowledge, has GMP conducted this review of the 1,400-foot segment?

Q.ANR:WGKL.2-4. If GMP has conducted this review, explain whether any new or revised pole placements, or tree trimming or cutting, will be necessary.

Q.ANR:WGKL.2-5. If any new or revised pole placements are necessary, provide a map showing all pole placements and their spatial relationship to relevant natural resources.

Q.ANR:WGKL.2-6. If any tree trimming or cutting is necessary, provide a map showing all areas of tree trimming or cutting and its spatial relationship to relevant natural resources.

Q.ANR:WGKL.2-7. If GMP has not yet conducted this review, indicate when you anticipate the review will occur and when you will have more information on new or revised pole placements and tree trimming or cutting.

Q.ANR:WGKL.2-8. Refer to the below excerpt from your response to **Q.ANR:WGKL.1-16** and answer the following questions.

“The second reason natural resources studies were not finished previously is that the line would be in a roadside location where upgrades are anticipated to occur via equipment placed on the Mountain View Road surface, with minimal new earth disturbance and no new tree clearing beyond GMP’s routine line maintenance. In VHB’s experience, this type and degree of work is performed routinely by GMP under their system-wide protocols and management practices, and does not create new natural resources impacts.”

Q.ANR:WGKL.2-9. Define and quantify what you mean by “minimal new earth disturbance.”

Q.ANR:WGKL.2-10. Explain the relevance, if any, of tree clearing which may be performed in connection with “GMP’s routine line maintenance” as compared to tree

clearing which may be performed in connection with a distribution upgrade attributable to and required by the Project's need to interconnect to GMP's distribution system in the context of the Commission's review of this Project.

Q.ANR:WGKL.2-11. Is it your position that tree trimming, cutting, or clearing performed in connection with a distribution upgrade attributable to and required by a proposed electric generation facility's need to interconnect to an existing distribution system that is similar in scope or kind to tree clearing performed during routine line maintenance of the same distribution system is not subject to the Commission's review of impacts under the Section 248(b)(5) natural resources criteria? Explain.

Q.ANR:WGKL.2-12. When did GMP last perform tree trimming, cutting, or clearing in connection with routine line maintenance on the 1,400-foot segment?

Q.ANR:WGKL.2-13. When is the 1,400-foot segment that requires an upgrade next scheduled for routine line maintenance involving tree trimming, cutting, or clearing?

REQUESTS TO PRODUCE

RTP.ANR:WGKL.2-1. Produce any and all documents identified, referenced, relied upon, or referred to in responding to these interrogatories and requests to admit.

DATED this 27th day of January 2026 at Montpelier, 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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Montpelier, VT 05620