

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 25-2774-PET

|                                                                                                                                                                  |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Petition of Williston H Solar, LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, for a 2.75 MW ground-mounted solar array in Williston, Vermont |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

**FIRST SET OF INFORMATION REQUESTS SERVED UPON  
WILLISTON H SOLAR, LLC  
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Alex Wing, hereby serves this First Set of Information Requests on Williston H Solar, LLC. (“WHS”), 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 WHS answers 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 March 4, 2026. Please provide WHS’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 (i.e. an excel spreadsheet).

**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 WHS is able to provide an answer or production. In other words, WHS should not withhold a response to any requests for which it has responsive data, documents, etc. until WHS 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). WHS must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to WHS. 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 WHS's filings. 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 WHS, 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 WHS 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 WHS desires clarification regarding 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 WHS.

DEFINITIONS

13. “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.
14. “WHS,” as used herein, refers to Williston H Solar, LLC.
15. “Department” and “DPS” each means the Vermont Department of Public Service.
16. “Commission” and “PUC” each means the Vermont Public Utility Commission.
17. “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.
18. “Petition” shall mean WHS’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.
19. “GMP” means Green Mountain Power Corporation.
20. “GFP” means GF Power, LLC.
21. “GF” means GlobalFoundries.
22. “PPA” means power purchase agreement.
23. The “Project” means the 2.75 MW ground-mounted solar photovoltaic electric generation facility to be constructed and operated off Redmond Road in Williston, Vermont, as Petitioned for by WHS in this proceeding.

**DEPARTMENT’S FIRST SET OF INTERROGATORIES AND REQUESTS TO  
PRODUCE SERVED UPON WILLISTON H SOLAR, LLC**

- Q.DPS.WHS.1-1:** Please refer to Exhibit WHS-JC-2 (the Project site plan) at 3 (C2.00) and 5 (C2.02), where it indicates that the interconnection line extends from a pad mounted transformer and initially runs overhead from a riser pole within the perimeter fence to a pole labelled “customer-owned span pole,” and then runs underground across Chip Aly Road to the “pad mounted equipment (typ)” adjacent to the substation. Simultaneously, Jake Clark, Encore Renewable Energy (“Clark”) pf. at 10, states that WHS “will own all equipment up to a vault adjacent to the GMP substation.” Conversely, Exhibit WHS-JC-6 (one line diagram), indicates that the line of demarcation between utility

responsibility and Project responsibility is between the primary metering riser and the transformer, both of which are within the Project perimeter fence and are described as being subject to WHS's responsibility elsewhere in the Petition.

- a. Please explain and correct these discrepancies.
- b. Who will own and/or be responsible for the underground electric line operating at primary voltage that crosses Chip Aly Road?
- c. If WHS is responsible, does WHS object to becoming a member of Dig Safe and complying with both 30 V.S.A. Ch. 86 and Commission Rule 3.800 for the life of the Project, as a condition for any certificate of public good?

**Q.DPS.WHS.1-2:** Please refer to Exhibit WHS-JC-5 (feasibility study) at 12, where it states that the first required interconnection upgrade is “[c]onstruction of a three-phase underground line extension approximately 50 feet in length using 1/0 Aluminum cable. The line extension would begin at the proposed [point of interconnection] for the Williston E Chip Alley Solar Project and extend southeast along the existing driveway to the intersection of Redmond Road and connect onto the former 19G3 distribution line.” Is this the same electric line referenced above, in Q.DPS.WHS.1-1, or is it a different underground primary line? Please explain and correct (note Exhibit WHS-JC-2 did not depict an underground electric line near Redmond Road).

Dated at Montpelier, Vermont this 18<sup>th</sup> day of February, 2026.

/s/ Alex Wing  
Alexander Wing, Special Counsel  
Department of Public Service  
112 State Street  
Montpelier, VT 05620-2601  
(802) 461-5009  
[alexander.wing@vermont.gov](mailto:alexander.wing@vermont.gov)

cc: ePUC Service List