

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

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 located off	)	Case No. 25-2774-PET
Redmond Road in Williston, Vermont	)	
	)	

**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 Williston H Solar, 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 Williston H Solar, LLC.

“Project” refers to the project that is the subject of this proceeding, Public Utility Commission Case No. 25-2774-PET, regarding the ground-mounted solar array in Williston, Vermont.

“You” or **“Your”** refers to Williston H Solar, LLC.

INTERROGATORIES

1. Identify and describe any areas of the project that are not mapped as PAS by the NRCS but are currently used or have been used recently for agricultural activities.
 - a. For these areas:
 - i. Identify and describe soil map units that will be impacted by the Project.
 - ii. Identify and describe each impact of the Project on the soil map units identified in response to Question 1.a.i.
2. The prefiled testimony of Stephanie Wyman at 4 states: “Woody debris generated by any shrub and tree clearing or trimming will be either offered to the landowners for use as firewood, or will be chipped, piled, or transported off site.” The Agency’s suggested condition #5 as found in Exhibit WHS-JC-4 states, in part: “Chips and ground wood shall be used to fill any minor depressions in areas where trees were removed, widely dispersed so as

not to form significant piles, and/or transported offsite for proper disposal. Wood in any form shall not be piled onsite after construction is complete.” Is the petitioner willing to comply with the proposed condition #5 in areas of PAS and to agree to include that condition in the CPG?

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.
4. Dated at Montpelier, Vermont this 18th day of February 2026.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

By: /s/ WillyJane Patry
WillyJane Patry
Staff Attorney
Agency of Agriculture, Food and Markets
116 State St
Montpelier, VT 05620-2901
willyjane.patry@vermont.gov