

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Northland Solar LLC for a)	
Certificate of Public Good, pursuant to 30)	
V.S.A. § 248, authorizing the installation)	Case No. 25-2346-PET
and operation of a 4.999 MW solar electric)	
generation facility in Lowell, Vermont)	

**Northland Solar LLC’s Responses to the Second Set of Discovery Requests
Served by the Town of Lowell**

Northland Solar LLC (“NS” or “Petitioner”), by and through the undersigned counsel, hereby responds to the first set of discovery requests served by the Town of Lowell on January 2, 2026.

General Objections

The following General Objections of Petitioner Northland Solar are incorporated by reference into its responses to each Interrogatory, Request to Produce, and Request for Admissions reproduced below, whether or not an objection is stated in any particular response. Any response to one of the Interrogatories, Requests to Produce, or Requests for Admission given below is given without waiver of any objection, whether or not an objection is stated.

1. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission reproduced below to the extent that it is overbroad, irrelevant, unduly burdensome, or not proportional to the needs of the case.
2. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission reproduced below to the extent that it calls for the disclosure of information or production of material privileged under the attorney-client, work-product, or any other applicable privilege.
3. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission reproduced below to the extent that it is unreasonably cumulative or duplicative, or calls for the disclosure of information or production of material that is obtainable from some other source that is more convenient, less burdensome, or less expensive, including, but not limited to, information or material that is publicly available or that has already been disclosed or produced to you in connection with another proceeding.
4. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission reproduced below to the extent that it calls for the disclosure or production of confidential or proprietary information, trade secrets, or material.

5. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission reproduced below to the extent that it is vague, unintelligible, requires speculation as to the information being sought, or is otherwise incapable of a reasonable answer.
6. Petitioner objects to each Instruction and Definition listed in the requesting party's discovery requests to the extent that it exceeds the bounds of permissible discovery or is unduly burdensome.
7. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission to the extent that the request exceeds the scope of Petitioner's testimony and exhibits.
8. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission to the extent that the request would require Petitioner to conduct extensive document review, additional studies, analyses, and/or tests as part of its response.
9. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission to the extent that the request exceeds the scope of the requesting party's intervention.
10. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission to the extent that the request exceeds the scope of the issues on review.
11. Petitioner objects to each Interrogatory, Request to Produce, and Request for Admission to the extent that it calls for a legal conclusion.

INFORMATION REQUESTS

Project Identification, Management, Components and Site Control

Q.TOL.NS.2-1. In regard to your general objection #9 stated in Northland Solar LLC's Responses to the First Set of Discovery Requests Served by the Town of Lowell and others, and specifically asserted in your responses to the following discovery requests for you which also provided substantive response:

1-2, 1-8, 1-10, 1-11, 1-13, 1-14, 1-19, 1-28,
1-30, 1-31 subparts a, b, c, d, 1-32, 1-37, 1-39, 1-40, 1-41, 1-42
1-73, 1-101, 1-116, 1-117, 1-118, 1-119, 1-120, 1-121, 1-127, 1-128
1-130, 1-131, 1-132, 1-133, 1-144, 1-145, 1-146, 1-147
1-152, 1-155, 1-156, 1-158, 1-159, 1-162, 1-164, 1-165

Given that the Town of Lowell is a statutory party rather than an intervenor, without limitation on the issues or areas of participation, and unaffected by the 11-25-2025 Order on Intervention,

- a. State with specificity the basis for your assertion that each discovery request listed above "exceeds the scope of the requesting party's intervention" to the extent it was propounded by the Town of Lowell; and,**
- b. To the extent that your response to any or all of the above-listed discovery requests was incomplete on the grounds of your objection that it "exceeds the scope of the requesting party's intervention", provide the complete response.**

Response:

- a. For each discovery request listed above for which Petitioner reasserted General Objection 9 to the extent that it exceeded the scope of the requesting party's intervention the phrase and/or "stated interests in this proceeding" was also included, and which applies to the Town of Lowell. The Town of Lowell filed a statement of its interests with the Commission in this proceeding. See Notice of Intervention Form signed by Jennifer Blay on behalf of the Selectboard and filed with the Commission on November 5, 2025. That statement specifically identified those issues on which the Town sought to participate and the areas of concern with respect to potential impact on the Town's interests. The list included: compliance with the Town plan, zoning of the project parcel, visual impacts on Route 58, proximity to deer wintering, grassland bird habitat on the parcel, and risks to the Lowell Graded School Water System. Petitioner's objection to questions outside the scope of these issues is therefore reasonably and appropriately based on the Town of Lowell's own statements to the Commission in its notice of participation in the proceeding. Additionally, to the extent that Petitioner reasserted other objections beyond General Objection 9, Petitioner also stands on those objections.

- b. Petitioner stands on its objection to these questions as outside the scope of the Town of Lowell's stated interests to the Commission and any other objections asserted, and therefore does not consider any responses identified in this question to be incomplete.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-2. In regard to your general objection #9 stated in Northland Solar LLC's Responses to the First Set of Discovery Requests Served by the Town of Lowell and others, and specifically asserted in your responses to the following discovery requests for you which you did not provide a substantive response:

**1-9, 1-12, 1-18, 1-35, 1-36, 1-37, 1-38
1-43, 1-44, 1-45, 1-46, 1-47, 1-49, 1-49
1-50, 1-51, 1-52, 1-66, 1-111, 1-129
1-134, 1-135, 1-136, 1-137, 1-139**

Given that the Town of Lowell is a statutory party rather than an intervenor, without limitation on the issues or areas of participation, and unaffected by the 11-25-2025 Order on Intervention,

- a. State with specificity the basis for your assertion that each discovery request listed above "exceeds the scope of the requesting party's intervention" to the extent it was propounded by the Town of Lowell; and,
b. Provide the complete response to each discovery request listed above.**

Response:

- a. For each discovery request listed above for which Petitioner reasserted General Objection 9 to the extent that it exceeded the scope of the requesting party's intervention the phrase and/or "stated interests in this proceeding" was also included, and which applies to the Town of Lowell. The Town of Lowell filed a statement of its interests with the Commission in this proceeding. See Notice of Intervention Form signed by Jennifer Blay on behalf of the Selectboard and filed with the Commission on November 5, 2025. That statement specifically identified those issues on which the Town sought to participate and the areas of concern with respect to potential impact on the Town's interests. The list included: compliance with the Town plan, zoning of the project parcel, visual impacts on Route 58, proximity to deer wintering, grassland bird habitat on the parcel, and risks to the Lowell Graded School Water System. Petitioner's objection to questions outside the scope of these issues is therefore reasonably and appropriately based on the Town of Lowell's own statements to the Commission in its notice of participation in the proceeding. Additionally, to the extent that

Petitioner reasserted other objections beyond General Objection 9, Petitioner also stands on those objections.

- b. Petitioner stands on its objection to these questions as outside the scope of the Town of Lowell's stated interests to the Commission and any other objections asserted, and therefore does not consider any responses identified in this question to be incomplete.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-3. In follow-up to your responses to Q. Intervenors:Petitioner 1-1, all subparts, ADMIT that Attachment TOL:NS.2-3 comprises the Articles of Organization for Northland Solar LLC, Petitioner in this PUC case.

Objection: Petitioner reasserts General Objections 1, 5, 7, 10 and 11. Without limiting or waiving the foregoing objections, Petitioner responds as follows.

Response: Petitioner has not been provided "Attachment TOL:NS.2-3". Petitioner's Articles of Organization are publicly available through the Secretary of State.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-4. In follow-up to your responses to Q.TOL:NS. 1-1, all subparts, ADMIT that Northland Solar LLC conducts one or more of the kinds of business which is subject to regulation by the Vermont Public Utility Commission.

Objection: Petitioner reasserts General Objections 1, 7, 10 and 11. Without limiting or waiving the foregoing objections, Petitioner responds as follows.

Response: Denied. Northland Solar has applied for a Certificate of Public Good to construct and operate a solar facility that, if approved, would be subject to Vermont Public Utility Commission regulation.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-5. ADMIT that prior to transmitting its Articles of Organization to the Vermont Secretary of State, Northland Solar LLC did not petition the PUC, pursuant to 30 VSA §102(a), for a determination of whether the establishment and maintenance of the business entity will promote the general good of the state.

Objection: Petitioner reasserts General Objections 1, 7, 9, and 10.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-6. If your response to Q.TOL:NS.2-5 is to ADMIT, explain with specificity why you did not so petition the PUC.

Objection: Petitioner reasserts General Objections 1, 7, 9, and 10.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-7. In regard to your response to Q.TOL:NS.1-17, state whether Petitioner is willing to provide, at Petitioner's expense, training to emergency personnel (fire, police, EMS) serving the vicinity of the Project, pertaining to hazards from and safe methods of responding to emergencies such as fire which may occur at or near the Project.

Response: The Project does not present hazards to emergency personnel that are unique from the existing substations or the transmission line running through the Town or other solar facilities in Lowell. Therefore, no specialized training is proposed for this Project.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-8. In regard to your response to Q.TOL:NS.1-21, which asserts, inter alia, that

Mr. Owens notes that the Project is located on a site identified as "Preferred Prime Ground Mounted Solar" on the NVDA Energy Map Preferred Ground- Mounted Solar Energy Sites, provided in Appendix D to Exhibit NS-JO-2 Aesthetic Analysis and Orderly Development Review.

and, given that Exhibit NS-JO-2 indicates that the Project is depicted as located in an area marked on that exhibit with a purple color, indicating, according to the legend, "Possible Constraint—Other", and further given that in Attachment A.TOL.NS. 1-62, NVDA Energy Planner Allie Webster, in an email communication to Thomas Hand, drew attention to the energy map indicating the "possible constraints" of the area including prime agricultural soils, explain with particularity the basis for Mr. Owens' assertion that the Project is located on a site identified as "Preferred Prime Ground Mounted Solar" on the NVDA Energy Map referenced.

Objection: Petitioner reasserts General Objection 5 to the extent that this question is confusingly worded and difficult to understand and therefore requires speculation to respond. Without limiting or waiving this objection, Petitioner responds as follows.

Response: Mr. Owens' determination is derived from the Regional Plan map's name ("NVDA Energy Map Preferred Ground-Mounted Solar Energy Sites"), the map's legend, and the map itself, which appears to delineate certain areas, including the area where the Project site is located, as "Preferred Prime Ground Mounted Solar."

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-9. In regard to Attachment Q.TOL.NS.1-64.4, explain with specificity how the mowing practices described by Mr. Geoffroy, to which Mr. Hand responded "I see no issues with continued maintenance as you described...", are consistent with, or conflict with, mowing practices which may be required by the Vermont Agency of Natural Resources for protection of grassland bird habitat.

Objection: Petitioner reasserts General Objection 5 to the extent that this question asks about mowing practices that may be required in the future by the Vermont Agency of Natural Resources and therefore requires speculation to respond. Without limiting or waiving this objection, Petitioner responds as follows.

Response: The area referenced by Mr. Hand is outside the project fence and continued maintenance is consistent with current and past agricultural practices related to sugaring the maple trees along the fence line. Maintaining the current mowing practices outside of the Project fence will not create a new disturbance to grassland bird habitat. Additionally, Petitioner expects to include this area as part of the area that will be mitigated for grassland bird habitat for the life of the Project.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-10. Identify any person or entity with whom you have communicated regarding the sale, assignment, or transfer of ownership or control of the Project or its Certificate of Public Good where such communication relates to post-approval ownership, operation, or compliance with permit conditions.

For each such person or entity, identify:

- a. The nature of the communication
- b. The date(s) of the communication
- c. Whether the communication contemplated transfer before or after commencement of operations

Objection: Petitioner reasserts Objections 1, 3, 4, 9 and 10. This request is unduly burdensome and not proportional to the needs of the case, is irrelevant to the Commission's review of the Project under Section 248, exceeds the scope of the Town's stated interests in this proceeding, is duplicative of prior requests and calls for disclosure of confidential information.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-11. Produce all non-privileged documents or communications—not previously produced—relating to the post-approval sale, assignment, or transfer of ownership or operational control of the Project or its Certificate of Public Good, excluding financial terms, and limited to issues affecting compliance with permit conditions or operational responsibility.

Objection: Petitioner reasserts Objections 1, 3, 4, 9 and 10. This request is unduly burdensome and not proportional to the needs of the case, is irrelevant to the Commission's review of the Project under Section 248, exceeds the scope of the issues on review and the Town's stated interests in this proceeding, is duplicative of prior requests and calls for disclosure of confidential information.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-12. Admit that the Petitioner anticipates transferring ownership or operational control of the Project to another entity following issuance of a Certificate of Public Good.

Objection: Petitioner reasserts Objections 1, 4, 9 and 10. This request is irrelevant to the Commission's review of the Project under Section 248, exceeds the scope of the issues on review and the Town's stated interests in this proceeding and calls for disclosure of confidential information. Without limiting or waiving the foregoing objections, Petitioner responds as follows:

Response: Denied.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-13. Admit that the identity of the post-construction owner or operator of the Project is not yet known.

Objection: Petitioner reasserts Objections 1, 9, and 10. This request is irrelevant to the Commission's review of the Project under Section 248 and exceeds the scope of the issues on review and the Town's stated interests in this proceeding. Without limiting or waiving the foregoing objections, Petitioner responds as follows:

Response: Denied.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-14. For each document or communication withheld on the basis of confidentiality in response to discovery concerning Project transfer or sale, identify:

- a. The general subject matter
- b. The date
- c. The parties involved
- d. The specific basis for asserting confidentiality

Objection: Petitioner reasserts General Objections 1, 9, and 10. This request is unduly burdensome and not proportional to the needs of the case, is irrelevant to the Commission's review of the Project under Section 248, and exceeds the scope of the issues on review and the Town's stated interests in this proceeding.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-15. Identify each electric generation project in Vermont for which Thomas Hand has held an ownership interest of ten percent (10%) or greater and that has received a Certificate of Public Good under 30 V.S.A. § 248.

For each such project, state:

- a. The project name, location, docket number, and in-service date;
 - b. Whether the project is subject to the Vermont Uniform Capacity Tax (UCT);
 - c. The amount of UCT paid for each calendar year since the project entered service;
- and**
- d. The taxing jurisdiction(s) receiving such payments.

Objection: Petitioner reasserts General Objections 1, 3, 7, 9, and 10. This request is unduly burdensome and not proportional to the needs of the case, is irrelevant to the Commission's review of the Project under Section 248, and exceeds the scope of the issues on review, the Town's stated interests in this proceeding, and Petitioner's testimony and exhibits.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-16. Produce all documents sufficient to show payment of the Vermont Uniform Capacity Tax for each project identified in response to INT-2-__, including tax bills, payment confirmations, or filings with the Vermont Department of Taxes.

Objection: Petitioner reasserts General Objections 1, 3, 5, 9, and 10. This request refers to an unidentified response and is incapable of response. It is further unduly burdensome and not proportional to the needs of the case, is irrelevant to the Commission's review of the Project under Section 248, and exceeds the scope of the issues on review and the Town's stated interests in this proceeding.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-17. State the estimated annual Vermont Uniform Capacity Tax obligation for the proposed Project, including:

- a. The assessed value or valuation methodology used;
- b. The applicable UCT rate;
- c. The expected annual payment amount; and
- d. The municipal taxing jurisdiction(s) that would receive such payments.

Response: The Uniform Capacity Tax ("UCT") rate of \$4/kW of plant capacity is set forth in statute. See 32 V.S.A. § 8701. Based on the project capacity of 4,999 kW, the Petitioner anticipates annual UCT obligations of \$19,996.00 for the Project, which will be paid to the Vermont Department of Taxes and not to a municipality. See Hand testimony at 15. UCT taxes collected by the Department of Taxes are deposited into the state Education Fund. See § 8701(a)(3). UCT taxes are separate from municipal property taxes.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-18. Admit that the Project will introduce new high-voltage electrical equipment on the Project parcel that does not currently exist.

Objection: Petitioner reasserts General Objection 5 as this question requires speculation as to the definition of "high voltage" to respond. Without limiting or waiving the foregoing objection, the Petitioner responds as follows.

Response: Denied. The Project will introduce new electric equipment on the Project parcel. However, it is Petitioner's understanding that the highest voltages of the Project's equipment will be substantially lower than the voltage of the existing transmission line

that bisects the Project parcel and other neighboring parcels and the utility substations on the adjacent parcels.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-19. Admit that the Project will require first responders to enter the fenced Project area during certain emergency scenarios.

Objection: Petitioner reasserts General Objection 5 as this question requires speculation as to potential unknown emergency scenarios to respond. Without limiting or waiving the foregoing objection, the Petitioner responds as follows:

Response: Admitted in part, denied in part. Admitted that it is possible that first responders would need to enter the fenced Project area in some unknown emergency scenario, denied to the extent that this question implies such a scenario is likely to occur or that first responders would necessarily be required to enter the Project area.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-20. Admit that the presence of fencing and locked enclosures does not eliminate all risk associated with high-voltage electrical equipment.

Objection: Petitioner reasserts General Objection 5 as this question requires speculation as to the definition of "high-voltage" to respond. Without limiting or waiving the foregoing objection, the Petitioner responds as follows.

Response: Admitted that the presence of high-voltage electrical equipment may pose a general risk that is not entirely eliminated by the presence of fencing and locked enclosures. However, the Project as proposed does not contain any high-voltage equipment compared to the existing electric infrastructure on and adjacent to the Project site. Nevertheless, the Project includes locked fencing and locked enclosures as standard safety measures to keep unauthorized people from accessing the Project and equipment. Additionally, the voltages associated with the Project equipment are substantially lower than the voltages of the existing transmission line that bisects the Project parcel and other neighboring parcels, and the adjacent utility substations. The utility substations are also surrounded by locked fencing.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-21. Admit that you have not conducted a Project-specific risk assessment addressing emergency response scenarios involving first responders.

Objection: Petitioner reasserts General Objection 5 as the terms “risk assessment” and “emergency response scenarios” are broad, vague and undefined, and the question requires speculation to respond. Without limiting or waiving the foregoing objection, the Petitioner responds as follows:

Response: Admitted that Petitioner has not done a specialized risk assessment of all potential emergency response scenarios involving first responders at the Project.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-22. Identify all facts, analyses, studies, or assessments supporting your contention that the Project does not pose a new or specific risk to first responders.

Response: It is Petitioner's understanding that all voltages associated with the Project equipment are at or below the voltages of the existing electrical infrastructure already present on the Project site and throughout the surrounding area of Lowell including: (a) existing VEC distribution lines throughout the surrounding area, (b) the transmission lines bisecting the Project parcel and neighboring parcels, and (c) the substations located west of the Project site. Therefore, it is reasonable to conclude that the Project infrastructure does not pose any new or specific risk to first responders that is not already present in Lowell.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-23. Describe each emergency scenario in which first responders could be required to enter the Project area and explain how electrical hazards would be mitigated in each scenario.

Objection: Petitioner reasserts General Objections 1 and 5 as this question is vague, overbroad, and requires speculation as to endless hypothetical emergency scenarios based on hypothetical conditions, is unduly burdensome, and is incapable of a reasonable answer.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-24. State whether any consultation occurred with local fire departments, emergency management personnel, or first responders regarding Project-specific electrical risks. If so, identify the participants and substance of the consultation.

Response: Petitioner has not consulted with local fire departments, emergency management personnel, or first responders regarding Project-specific electrical risks as Petitioner does not believe this Project poses unique risks that do not already exist for emergency responders in Lowell. See response to Q.TOL.NS.2-22. If local emergency responders have specific questions about the Project, Petitioner would be more than happy to speak with them.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-25. Identify all assumptions underlying your statement that emergency responders are trained to deal with the electrical voltage risks present at the Project.

Objection: Petitioner reasserts General Objection 5 to the extent that this question does not point to the source of the statement referred to and therefore requires speculation to respond. Without limiting or waiving this objection, Petitioner responds as follows.

Response: See response to Q.TOL.NS.2-22. The Project parcel and surrounding parcels already host electric equipment with voltages in excess of those associated with the Project. Petitioner therefore presumes that local emergency responders could presently be expected to respond to emergencies associated with this existing infrastructure irrespective of the Project.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-26. Produce all documents relied upon in asserting that the Project does not pose a new or specific risk to first responders, the public, children, or wildlife.

Objection: Petitioner reasserts Objections 1, 3, and 5, to the extent that this question is overbroad and that it would be unduly burdensome for Petitioner to cite to every operational solar facility in the state and such information is publicly available. Without limiting or waiving the foregoing objections, Petitioner responds as follows.

Response: See response to Q.TOL.NS.1-17 and Q.TOL.NS.2-22. See also Prefiled Testimony of Thomas Hand at 22-23, Exhibits NS-TH-3, NS-TH-4a, and Exhibit NS-TH-4b. Petitioner also relies on the general existence of solar generation facilities across Vermont that use the same technology and have the same types of protective measures

employed as those proposed for this Project. Petitioner has no other documents responsive to this request.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-27. Produce all emergency response plans, training materials, or protocols specific to the Project.

Objection: Petitioner reasserts General Objections 1 and 5 to the extent that this question could be read as asking for any "protocols" specific to the Project, which is overbroad, undefined, incapable of reasonable response, and would be unduly burdensome. Without limiting or waiving these objections, Petitioner responds as follows.

Response: Petitioner has no documents responsive to this request.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-28. Produce all communications with local fire departments, emergency responders, or emergency management agencies regarding the Project.

Objection: Petitioner reasserts General Objection 3 to the extent that this question is duplicative of previously asked discovery request Q.TOL.NS.1-128. Without waiving or limiting this objection, Petitioner responds as follows.

Response: See response to Q.TOL.NS.2-24.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-29. Produce all wildlife impact assessments addressing potential interaction with electrical infrastructure associated with the Project.

Response: Petitioner has no documents responsive to this request.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-30. Admit that the Northland Solar Project site is located on land that is currently used for agricultural purposes within or adjacent to Lowell Village.

Objection: Petitioner reasserts General Objection 5 to the extent that “agricultural purposes” and “Lowell Village” are vague and undefined terms and that “adjacent to” with respect to zoning districts is vague and requires speculation to respond. Without waiving this objection, Petitioner responds as follows.

Response: Admitted in part and denied in part. Admitted that the Project site is currently utilized as a hay field, which could qualify as an agricultural purpose. Denied that the Project site is located within the “Village” zoning district as set forth in the Town of Lowell’s zoning map previously provided as Attachment Q.TOL.NS.1-68.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-31. Admit that the Project site is not a former slate pile, gravel pit, landfill, or industrial site.

Response: Admitted that the Project is proposed on a hay field that has not, to Petitioner’s knowledge, previously been used as a slate pile, gravel pit, landfill or industrial site.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-32. Admit that the Project site differs in character from the sites depicted on MHG’s website that are described as repurposed slate piles, gravel pits, landfills, or industrial lands.

Objection: Petitioner reasserts General Objections 1, 5, 7 and 10 as “MHG” is not a party, the website referred to is not specifically identified, and presuming that this question is intended to refer to MHG Solar’s website, such photos are not relevant to this proceeding and are outside the Commission’s review under Section 248.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-33. Admit that the Petition does not include a written analysis of the cultural significance of the Project site to the surrounding community.

Objection: Petitioner reasserts General Objection 5 as the term “cultural significance” is vague and undefined, and the question requires speculation to respond. Without limiting or waiving the foregoing objection, the Petitioner responds as follows:

Response: Denied. The petition contains a written analysis of the Project with respect to the Project's compliance with orderly development of the region, including a review of the Town and Regional Plans. Neither the Town of Lowell nor the Regional Plan identified the Project site as culturally significant.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-34. Admit that the Petition does not include a survey, poll, or other quantitative assessment of community opinion regarding the Project.

Response: Admitted.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-35. Admit that the Petition does not identify any alternative Project sites evaluated to avoid use of agricultural land.

Response: Admitted.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-36. Admit that Petitioner did not provide notice of the Project to the Town or adjoining landowners prior to the minimum notice period required by statute or rule.

Objection: Petitioner reasserts General Objection 5 to the extent that it is not clear what minimum notice period is being referred to in this question and requires speculation to respond. Without waiving or limiting this objection, Petitioner responds as follows.

Response: Denied. Petitioner filed the petition more than 45-days after delivering the advance notice and therefore the Town and adjoining landowners had more time than the minimum statutory notice before the petition was filed.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-37. Admit that Petitioner did not conduct any public informational meeting regarding the Project prior to filing the Section 248 petition.

Response: Admitted.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-38. Admit that Petitioner did not provide Project notice to residents of Lowell Village beyond those landowners legally required to receive notice.

Objection: Petitioner reasserts General Objection 5 to the extent that "Lowell Village" is not a defined term and therefore requires speculation to respond. Without limiting or waiving this objection, Petitioner responds as follows.

Response: Admitted that Petitioner did not mail a 45-day notice letter to residents of Lowell other than adjoining landowners, the host landowner, the Town of Lowell Select Board, and the Town of Lowell Planning Commission, consistent with the requirements of the PUC Rules.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-39. Admit that Petitioner did not engage in any voluntary outreach to community members prior to filing the Section 248 petition.

Response: Denied. Petitioner interacted with a number of abutters and community members prior to filing the Section 248 petition. See Response to Q.TOL.NS.1-64.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-40. Produce all documents relating to public outreach, community engagement, or voluntary notification efforts undertaken prior to filing the Section 248 petition.

Response: There are no documents responsive to this request beyond what the Petitioner provided in response to the initial round of discovery in this proceeding.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-41. Identify all solar energy projects for which Thomas Hand has been an owner, developer, or principal and that have undergone full or partial decommissioning. For each project, state:

- a. The project name and location;
- b. The year decommissioning occurred;

- c. **The scope of decommissioning work performed; and**
- d. **Mr. Hand's role, if any, in overseeing or managing the decommissioning.**

Objection: Petitioner reasserts General Objections 1, 3, and 10 as this request is irrelevant to the Commission's review under Section 248, and is overbroad and requests information for facilities outside of Vermont. Without limiting or waiving these objections, Petitioner responds as follows.

Response: No project that Mr. Hand has been involved with has undergone full or partial decommissioning yet.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-42. Describe in detail the basis for the decommissioning cost estimate submitted for the proposed Project, including:

- a. **Whether the estimate is based on prior decommissioning experience of Thomas Hand or any affiliated entity;**
- b. **Whether the estimate relies on third-party contractors, industry benchmarks, published studies, or assumptions;**
- c. **The identity and qualifications of any person or entity providing decommissioning cost input; and**
- d. **Any uncertainties, contingencies, or assumptions reflected in the estimate.**

Objection: Petitioner reasserts General Objection 9 to the extent that this question goes beyond the Town's stated interests in this proceeding. Without limiting or waiving this objection, Petitioner responds as follows.

Response: Petitioner's decommissioning cost estimate submitted in its petition materials is based on Mr. Hand's prior experience with respect to compiling decommissioning estimates for solar facilities in Vermont and is in comparable range of estimates of similarly situated solar projects in Vermont with approved decommissioning plans.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-43. Produce all documents supporting the decommissioning cost estimate for the proposed Project, including contractor quotes, prior project data, spreadsheets, correspondence, or studies relied upon.

Objection: Petitioner reasserts General Objections 3 and 9 to the extent that this question is overbroad, requests publicly available information, and the request goes beyond the

Town's stated interests in this proceeding. Without limiting or waiving the foregoing objections, the Petitioner responds as follows:

Response: Please see the Prefiled Testimony of Thomas Hand at 10, and Exhibit NS-TH-5.

Person Responsible for Response: Thomas Hand, MHG Solar

Economic Benefit and Need for the Project: 30 VSA §(a)(2)(A)

Q.TOL.NS.2-44. Admit that the Kingdom Community Wind Project is located in the Town of Lowell.

Objection: Petitioner reasserts General Objections 1, 3, 7, and 10 as this question is irrelevant to the Commission's review of the Project, asks for publicly available information, and goes beyond Petitioner's testimony and exhibits and scope of issues on review. Without limiting or waiving these objections, Petitioner responds as follows.

Response: Admitted that to Petitioner's knowledge, the Kingdom Community Wind Project is at least partially located within the Town of Lowell.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-45. Admit that the Kingdom Community Wind Project has an installed capacity of approximately 63 megawatts.

Objection: Petitioner reasserts General Objections 1, 3, 7, and 10 as this question is irrelevant to the Commission's review of the Project, asks for publicly available information, and goes beyond Petitioner's testimony and exhibits and scope of issues on review. Without limiting or waiving these objections, Petitioner responds as follows.

Response: Neither admit nor deny. Petitioner has not researched the Kingdom Community Wind Project and has no specific knowledge of what the installed capacity of the system is.

Person Responsible for Response: Thomas Hand, MHG solar

Q.TOL.NS.2-46. Admit that the Kingdom Community Wind Project was operational prior to the filing of the Northland Solar Section 248 petition.

Response: Admitted.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-47. Admit that the Northland Solar Project would add additional renewable energy generation infrastructure within the Town of Lowell.

Response: Admitted.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-48. Admit that the Petition does not include an analysis of cumulative land use or community impacts resulting from the combined presence of the Kingdom Community Wind Project and the proposed Northland Solar Project.

Objection: Petitioner reasserts General Objections 1, 5, and 10 as the phrase “cumulative land use or community impact” is vague and undefined and therefore incapable of a reasonable response and the Kingdom Community Wind Project is not relevant to compliance of the Project with Section 248. Without limiting or waiving the foregoing objections, the Petitioner responds as follows.

Response: Denied. Exhibit NS-JO-2 acknowledges the presence of the existing Kingdom Community Wind facility. The aesthetic report considers the presence and visibility of the Kingdom Community Wind facility, and any other facility, as it relates to the existing views, materials, and character of the project's surroundings.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-49. Identify all portions of the Petition, testimony, or exhibits that analyze the cumulative effects of existing renewable energy facilities in the Town of Lowell together with the proposed Northland Solar Project.

Objection: Petitioner reasserts General Objection 5 as the phrase “cumulative effects” is vague and undefined. Without limiting or waiving the foregoing objection, the Petitioner responds as follows:

Response: See answer to Q.TOL.NS.2-48.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-50. Admit that electricity generated by the Northland Solar Project will be injected into the Vermont transmission system.

Objection: Petitioner reasserts Objections 5 and 9 as this admission request is vague and exceeds the scope of the Town's stated interests in this proceeding. Without limiting or waiving the foregoing objections, the Petitioner responds as follows.

Response: Denied.

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-51. Admit that electricity generated by the Northland Solar Project may flow across the Sheffield–Highgate Export Interface.

Objection: Petitioner reasserts Objections 5 and 9 as this admission request exceeds the scope of the Town's stated interests in this proceeding and is vague and unintelligible. Without limiting or waiving the foregoing objections, the Petitioner responds as follows.

Response: Admitted that the Project is located within the Sheffield-Highgate Export Interface ("SHEI").

Person Responsible for Response: Thomas Hand, MHG Solar

Q.TOL.NS.2-52. Admit that the Sheffield–Highgate Export Interface limits the amount of power that can be exported from the Northeast Kingdom.

Objection: Petitioner reasserts Objections 5 and 9 as this admission request exceeds the scope of the Town's stated interests in this proceeding, requires speculation as to the transmission capabilities of multiple utility providers, and is vague, confusingly worded and is not limited to any time period.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-53. Admit that the Petition does not include a quantitative analysis of how the Project's output will affect flows across the Sheffield–Highgate Export Interface.

Objection: Petitioner reasserts Objections 1, 5, and 9 as this admission request exceeds the scope of the Town's stated interests in this proceeding, and the phrase "affect flows" is vague and undefined.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-54. Identify all studies, analyses, or modeling relied upon to assess the effect of the Project's generation on power flows across the Sheffield–Highgate Export Interface.

Objection: Petitioner reasserts Objections 1, 5, and 9 as this request exceeds the scope of the Town's stated interests in this proceeding, and the terms "effect" and "power flows" are vague and undefined. Without limiting or waiving the foregoing objections, the Petitioner responds as follows:

Response: See Exhibit NS-TH-4a; Exhibit NS-TH-4b, and Exhibit NS-TH-6.

Person Responsible for Response: Thomas Hand, MHG Solar

Greenhouse Gas Impacts

Q.TOL.NS.2-55. Identify all studies, models, or analyses prepared or relied upon by Petitioner regarding the expected contribution of the Project's generation to New England electric system capacity, including peak load periods.

Objection: Petitioner reasserts General Objections 1, 5, and 9 as this request goes beyond the scope of the Town's stated interests in this proceeding, does not identify the source of what conclusion or statement in Petitioner's testimony or exhibits it is referring to, is overbroad and requires speculation to respond.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-56. Identify whether any analysis was performed to determine whether the Project's output would reduce or offset generation from fossil-fuel plants. If so, provide the author, methodology, and results.

Objection: Petitioner reasserts General Objections 1 and 9 as this request is overbroad and goes beyond the scope of the Town's stated interests in this proceeding.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-57. Produce all studies, reports, or modeling documents relied upon to evaluate the Project's effect on fossil-fuel generation or system capacity, including any regional or ISO-NE studies.

Objection: Petitioner reasserts General Objections 1, 5, and 9 as this request is vague, overbroad, and goes beyond the scope of the Town's stated interests in this proceeding.

Person Responsible for Response: Counsel for Petitioner

System Stability and Reliability: 30 VSA 248(b)(3)

Q.TOL.NS.2-58. Identify all data sources used to calculate the expected annual energy generation of the Northland Solar Project, including:

- a. Name and location (latitude and longitude) of the weather data source;
- b. All PV system specifications, including DC and AC system size, module type, array tilt, azimuth, system losses, and inverter efficiency; and
- c. The name of the computer simulation program used (e.g., NREL PVWatts).

Objection: Petitioner reasserts Objections 1, 3, and 9. This request is unduly burdensome and not proportional to the needs of the case, exceeds the scope of the Town's stated interests in this proceeding, and is duplicative of prior requests.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-59. Produce all data files, spreadsheets, reports, or other documents used to calculate or simulate the expected annual energy generation of the Project, including inputs, assumptions, and outputs.

Objection: Petitioner reasserts Objections 1, 3, and 9. This request is unduly burdensome and not proportional to the needs of the case, exceeds the scope of the Town's stated interests in this proceeding, and is duplicative of prior requests.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-60. Provide the following output results from the simulation used to calculate expected annual energy generation of the Northland Solar Project:

- a. Monthly average solar radiation (kWh/m²/day) at the Project site.
- b. Monthly AC energy generation (MWh) for the Project.

- c. Annual AC energy generation (MWh) for the Project. If hourly or daily output results were not generated, explain why these were not produced for a 5 MW project.**

Objection: Petitioner reasserts Objections 1, 3, 7 and 9. This request is unduly burdensome and not proportional to the needs of the case, exceeds the scope of the Town's stated interests in this proceeding and Petitioner's testimony and exhibits, and is duplicative of prior requests.

Person Responsible for Response: Counsel for Petitioner

- Q.TOL.NS.2-61. Produce all spreadsheets, reports, or other documents containing the monthly and annual simulation outputs used to calculate expected energy generation for the Northland Solar Project.**

Objection: Petitioner reasserts Objections 1, 3, and 9. This request is unduly burdensome and not proportional to the needs of the case, exceeds the scope of the Town's stated interests in this proceeding, and is duplicative of prior requests.

Person Responsible for Response: Counsel for Petitioner

Aesthetics, Historic Resources and Public Health and Safety: 30 V.S.A. § 248(b)(5); 10 V.S.A. § 6086(a)(8)

Visual Aesthetic Impacts

- Q.TOL.NS.2-62. Confirm whether the Prefiled Testimony and Exhibits of Jeremy B. Owens constitutes the complete statement of his opinions regarding the aesthetic analysis of the Project as of October 2, 2025.**

Response: Mr. Owens' final conclusions regarding the Projects' potential aesthetic impacts as of October 2, 2025 are included in his testimony and exhibits.

Person Responsible for Response: Jeremy Owens, T.J. Boyle and Associates

- Q.TOL.NS.2-63. Identify any additional documents, data, photographs, or other materials that Mr. Owens reviewed, considered, or relied upon in forming his aesthetic opinions included in the Prefiled Testimony and Exhibits.**

Objection: Petitioner reasserts General Objections 2 and 3 to the extent that this question is requesting identification of privileged documents and documents previously produced as part of the Petition and in response to prior discovery. Without limiting or waiving these objections, Petitioner responds as follows.

Response: Mr. Owens primarily relied upon a field visit and inspection of the site and surrounding areas, the Project site plan, and the mapping provided in Appendix A to Exh. NS-JO-2 in forming his opinions. In addition to the documents previously provided in response to Q.TOL.NS.1-103 and project plans, Mr. Owens also relied on photographs taken from his field investigation that were saved and reviewed during the preparation of the analysis, as well as CAD files of the Project design provided by Krebs and Lansing, aerial imagery, as well as street view imagery publicly available on Google Maps.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-64. Produce any existing documents, reports, or data considered by Mr. Owens in forming his aesthetic opinions, beyond what is included in the Prefiled Testimony and Exhibits, that are available as of the date the testimony was filed.

Objection: Petitioner reasserts General Objections 2, 3, and 4 to the extent that this question is requesting production of privileged or proprietary documents and documents previously produced in response to prior discovery. Without limiting or waiving these objections, Petitioner responds as follows.

Response: All photographs from the field investigation are provided in Attachments Q.DPS.NS.2-1_2 and Q.DPS.NS.2-1_3. The CAD file from Krebs & Lansing is included as Attachment Q.DPS.NS.2-1_1. The source information for the mapping in Appendix A was pulled from the publicly available Vermont Center for Geographic Information online databases. Aerial imagery of the underlying existing conditions is provided on those plans; see Exh. NS-TH-2 and Exh. NS-JO-2.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-65. Admit that the Northland Solar Project is adjacent to the Village of Lowell and is in the rural/ agricultural area based on the NVDA Regional Map page 18.

Objection: Petitioner reasserts General Objections 1 and 5 as “adjacent to” is a vague, overbroad, and undefined term and requires speculation to respond, and contains two separate statements within one request to admit. Without limiting or waiving the foregoing objections, the Petitioner responds as follows:

Response: Denied. The NVDA Region: Future Land Use map on page 18 of the NVDA Regional Plan Land Use chapter shows the Town boundary and indicates a village center location through the use of a single point symbol that appears to be the same size for every Town in which a village center is indicated on the map. Whether the Northland Solar Project is adjacent to the "Village of Lowell" is indeterminable based on the data displayed on the NVDA Regional Map at page 18. There is nothing on the map on page 18 that depicts "rural/agricultural area."

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-66. Identify and describe any analysis, study, or evaluation conducted by Petitioner assessing the compatibility of the Northland Solar Project with the NVDA Regional Plan, including but not limited to:

- 1. Future Land Use & Development Goals (compatibility with existing land uses and consideration of adjacent regions)**
- 2. Siting Policies for Solar (brownfield or village center prioritization)**
- 3. Natural Resource Goals (recreation, open space, farmland preservation, and other environmental resources)**

Include the author, date, methodology, and conclusions of each analysis.

Response: See the Prefiled Testimony of Jeremy Owens and Exhibit NS-JO-2.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-67. Produce all documents, reports, studies, correspondence, or data relied upon to assess the Project's compliance with the NVDA Regional Plan, including references in the Petition, prefiled testimony, or appendices (including NS-JO-2 Appendix D).

Objection: Petitioner reasserts General Objection 3 as the request calls for information that is publicly available. Without limiting or waiving the foregoing objection, Petitioner responds as follows.

Response: See the Prefiled Testimony of Jeremy Owens and Exhibit NS-JO-2 and the full NVDA Regional Plan, which is publicly available.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-68. Admit that the Project will occupy productive agricultural land, potentially removing it from production for multiple decades, in a manner that could conflict with the NVDA Regional Plan's guidance discouraging siting ground-mounted solar on productive farmland.

Objection: Petitioner reasserts General Objections 5 as the request is vague as to the specific reference of "guidance" referred to, the terms "productive", "could conflict" and "potentially removing it" are overbroad and undefined, and the request therefore calls for speculation to respond. Without limiting or waiving the foregoing objection, Petitioner responds as follows.

Response: Admitted in part, Denied in part. Admitted that the Project is proposed on an existing hay field. Denied that the Project's existence on the hay field conflicts with the NVDA Regional Plan.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates; Thomas Hand, MHG Solar

Q.TOL.NS.2-69. Identify specific points or segments along Vermont Route 58 from which the proposed screening plantings will be visible. For each point, provide:

- a. Approximate distance from the edge of the roadway to the plantings;
- b. Height and species of the screening vegetation;
- c. Expected degree of visibility (partial, full, seasonal);
- d. Whether visual simulations or photographs exist for these points.

Objection: Petitioner reasserts General Objections 1, 3, 7 and 8. Without limiting or waiving these objections, Petitioner responds as follows.

Response: Please refer to the Prefiled Testimony of Jeremy Ownes and Exhibit NS-JO-2 for a description of views from Vermont Route 58, proposed landscape planting location and sizes, and responses to Q.TOL.NS.1.83 and Q.TOL.NS.1-96.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-70. Identify and describe any analyses, studies, or evaluations conducted by Petitioner regarding the compatibility of the Northland Solar Project with the Town of Lowell Plan's Vision Statement, Goals, and Objectives, including the Vision for rural agricultural preservation, neighbor harmony, and maintenance of rural character. Include author, date, methodology, and conclusions.

Response: See the Prefiled Testimony of Jeremy Owens and Exhibit NS-JO-2.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-71. Produce all documents, reports, notes, or communications prepared or relied upon to assess the Project's compatibility with the Town of Lowell Plan, including correspondence with consultants, town officials, or community members regarding aesthetics, rural character, or farmland preservation.

Objection: Petitioner reasserts General Objection 3. Without limiting or waiving the foregoing objection, Petitioner responds as follows.

Response: Please refer to the Prefiled Testimony of Jeremy Owens and Exhibit NS-JO-2 and the documents referenced therein. Mr. Owens relied upon the Lowell Town Plan and the project plans (Exh. NS-TH-2) and other petition materials.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-72. Admit that the Project will convert productive agricultural land to a solar array and that portions of the Project may be visible from nearby residential areas.

Objection: Petitioner reasserts General Objections 5 and 6 as this request contains two separate and unrelated statements for admission in one request to admit, which cannot be reasonably responded to, and the request is vague as to the meaning of "convert", "productive" and "may be visible" and therefore calls for speculation to respond.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-73. Identify all residential properties within 1,000 feet of the Project and describe the expected visibility of the solar array from each, including screening and mitigation measures.

Objection: Petitioner reasserts General Objections 1, 3, 8 and 9 to the extent that visibility from individual residential properties is outside the Town's stated interests in this proceeding, this request is overbroad, is duplicative of other discovery requests, asks for information previously provided, or requests further analysis. Without limiting or waiving these objections, Petitioner responds as follows.

Response: See Project Site Plan, provided as Exhibit NS-TH-2, which shows all abutting properties. Exhibit NS-JO-2 includes a description of nearby private properties. Exhibit NS-JO-2, Appendix A, Map 3 depicts expected areas of potential visibility taking into

account existing vegetation. Exhibit NS-JO-2, Appendix B includes photographs from the Project site looking in all directions, with viewpoints indicated on the mapping in Exhibit NS-JO-2, Appendix A. Landscape mitigation measures are depicted in Exhibit NS-JO-2, Appendix C.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-74. Identify and describe any analysis or study conducted by Petitioner regarding the Project's impact on agricultural operations, rural character, or open space within the Town of Lowell.

Response: See Exhibit NS-JO-2 and the prefiled testimony of Jeremy Owens.

Person Responsible for Response: Jeremy Owens, T.J. Boyle Associates

Q.TOL.NS.2-75. Identify all solar generation projects for which Mr. Owens has provided testimony regarding aesthetic impacts in Vermont, New England, or similar rural settings, including:

- a. Name and location of the project;**
- b. Date of testimony;**
- c. Nature of the aesthetic impacts identified;**
- d. Any written report or visual simulations prepared in connection with such testimony.**

Objection: Petitioner reasserts General Objections 1, 3, 8, and 10 as this request would require extensive document review to answer, the information requested for projects located in Vermont is publicly available, and the information requested for projects located outside of Vermont is irrelevant to, and outside the scope of, the Commission's review under Section 248. Without limiting or waiving these objections, Petitioner responds as follows.

Response: Testimony provided by Mr. Owens before the Vermont PUC regarding solar generation projects is publicly available through the PUC and a portion of the projects he has provided testimony on are listed in his resume provided as Exhibit NS-JO-1.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-76. Produce copies of reports, exhibits, visual simulations, or testimony prepared by Mr. Owens for the projects identified above, to the extent not already publicly available.

Objection: Petitioner reasserts General Objections 1, 3, 8, and 10 as this request would require extensive document review to answer, the information requested for projects located in Vermont is publicly available, and the information requested for projects located outside of Vermont is irrelevant to, and outside the scope of, the Commission's review under Section 248.

Person Responsible for Response: Counsel for Petitioner

Historic Resources

Q.TOL.NS.2-77. Identify all sources or studies confirming the historical use of the Raboin property for agricultural purposes since the early 20th century.

Objection: Petitioner reasserts General Objections 1, 3, 5, 7, and 9 as this request exceeds the scope of and the Town's stated interests in the proceeding, is vague as to the property being asked about, and exceeds the scope of Petitioner's testimony and exhibits.

Person Responsible for Response: Counsel for Petitioner

Q.TOL.NS.2-78. Produce any documents, surveys, or records that verify the agricultural use of the Raboin property, including historical maps, deeds, or tax assessments.

Objection: Petitioner reasserts General Objections 1, 3, 5, 7, and 9 as this request exceeds the scope of and the Town's stated interests in the proceeding, is vague as to the property being asked about, is irrelevant and outside the scope of the Commission's review and Petitioner's testimony and exhibits.

Person Responsible for Response: Counsel for Petitioner

Water Conservation and Burden on Existing Water Supply:

10 V.S.A. § 6086(a)(1)(C) and (3)

Impact on Water Purity: 20 VSA 248(b)(5)

Headwaters: 10 VSA 6086(a)(1)(A)

Q.TOL.NS.2-79. State whether you would be willing to pay for well and/or spring inspections at the homes adjoining the Project on Route 100 and Route 58 before and after construction.

Objection: Petitioner reasserts General Objections 1, 3 and 9 as this request exceeds the scope of the Town's stated interests in the proceeding, and is a duplicative request. Without limiting or waiving these objections, Petitioner responds as follows:

Response: See response to Q.TOL.NS.1-158.

Person Responsible for Response: Thomas Hand, MHG Solar

Dated at Burlington, Vermont this 23rd day of January 2026.

As to Objections:



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