

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0261-PET

Petition of Novus 242 Solar, LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 3.75 MW ground-mounted solar array in Jay, Vermont	
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**FIRST SET OF INFORMATION REQUESTS
SERVED UPON NOVUS 242 SOLAR, LLC
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department”), by its counsel, Caroline Daniels, hereby serves this First Set of Information Requests upon Novus 242 Solar, LLC (“Petitioner”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that Petitioner answer the requests herein, conforming to Commission Rule 2.230, and deliver its answers and all requested documents and materials to the Department no later than **April 24, 2026**. 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 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). 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.

DEFINITIONS

8. "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.

9. "Petition," as used herein, means the Petitioner'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.

10. "Petitioner," as used herein, means Novus 242 Solar, LLC.

11. "Project," as used herein, means the 3.75 MW solar electric generation system the Petitioner has proposed in Jay, Vermont.

12. "VEC," as used herein, means Vermont Electric Cooperative.

13. With respect to each document produced by Petitioner, please identify the person who prepared the document and the date on which it was prepared.

14. 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.

15. 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.

16. 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.

17. The Department reserves the right to submit additional information requests to Petitioner.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.PETITIONER.1-1. Please refer to page 14 of the Prefiled Direct Testimony of Alex Bravakis, which reads “While projects 5 MW or less in size are not generally subject to ISO-New England interconnection requirements, the Project is included in a cluster study review by ISO-NE of many smaller distribution level generation facilities. This study is anticipated to be completed by June of 2026. Petitioner has discussed this with VEC and understands from VEC they do not expect there to be any adverse impacts identified by ISO-NE due to the Project’s interconnection to the distribution level system.” Please provide an update on the anticipated completion date of the ISO-NE cluster study.

Dated at Montpelier, Vermont, this 3rd day of April 2026.

Respectfully submitted,
VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Caroline Daniels
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