

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Savage Solar Energy LLC for a	)	
Certificate of Public Good, pursuant to 30 V.S.A. §	)	
248, authorizing the installation and operation of a	)	
2.75 MW solar electric generation facility off	)	Case No. 26-0540-PET
Route 103 in Chester, Vermont to be known as the	)	
“Savage Solar Energy Project”	)	

**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 Savage Solar Energy 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 Savage Solar Energy LLC.

“Primary Agricultural Soils” (PAS) means any area of the project that fits the definition in 10 VSA § 6001 (15) (A) and (B).

“Project” refers to the project that is the subject of this proceeding, Public Utility Commission Case No. 26-0540-PET, regarding the solar electric generation facility in Chester, Vermont.

“You” or **“Your”** refers to Savage Solar Energy LLC.

INTERROGATORIES

1. Describe the design of the conduit trenching mentioned in the prefiled testimony of Seth Goddard at 9.
2. Describe the type of soil as shown on the Vermont Agency of Natural Resources Atlas where the access road enters from Vermont Route 103 and where grading and clearing are proposed, as shown on sheets C-100 and C-103 of Exhibit SSE-TH-2.
3. If the soil type described in question 2 is PAS, is that acreage included in the calculation of PAS within the LOD?

a. 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 May 2026.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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