

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0540-PET

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 Route 103 in Chester, Vermont to be known as the “Savage Solar Energy Project”	
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**VERMONT DEPARTMENT OF PUBLIC SERVICE
FIRST SET OF INFORMATION REQUESTS
SERVED UPON SAVAGE SOLAR ENERGY LLC**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Matthew Bakerpoole, hereby serves this First Set of Information Requests upon Savage Solar Energy LLC (“Savage Solar” or “SSE”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that Savage Solar answer the requests herein, conforming to Commission Rule 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Department no later June 5, 2026. Please provide Savage Solar’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 Savage Solar is able to provide an answer or production. In other words, Savage Solar should not withhold a response to any requests for which it has responsive data, documents, etc. until Savage Solar is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires the response to each request 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 the 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). Savage Solar must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to Savage Solar. 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 Savage Solar's filing. 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 Savage Solar, 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 Savage Solar 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 Savage Solar 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.

12. The Department reserves the right to submit additional information requests to Savage Solar.

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. “Savage Solar” and “SSE” as used herein, mean Savage Solar Energy, LLC.

15. “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.

16. “Petition,” as used herein, means Savage Solar’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.

17. “Project,” as used herein, means Savage Solar’s proposed 2.75 MW solar facility in Chester, Vermont.

18. “Department,” as used herein, means the Vermont Department of Public Service.

19. “GMP,” as used herein, means Green Mountain Power.

20. “PPA,” as used herein, means power purchase agreement.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.SSE.1-1 Referring to Exhibit SSE-TH-4 on page 1, please explain why the estimated total cost of \$97,000 for decommissioning is materially lower than the estimate for a similar project filed in Case No. 25-1977-PET, Essex C Parking Lot Solar (“Essex Solar”). The decommissioning estimate for Essex Solar, a 3 MW ground mounted project proposed to be built on an existing parking lot, is \$133,460. The estimated cost of decommissioning Essex Solar is \$44,486.67 per MW. The estimated cost of decommissioning Savage Solar is \$35,272.73, or approximately twenty percent less than Essex Solar.

Q.DPS.SSE.1-2 Referring to Exhibit SSE-TH-5, a GMP Feasibility Study dated 4/12/2023. Aside from electing to make certain upgrades as part of its Zero Outage Initiative, has GMP indicated any revisions or updates are required for the Feasibility Study, given it is over three years old?

Q.DPS.SSE.1-3 Referring to the Prefiled Direct Testimony of Thomas Hand at 15:

With respect to the 579' of existing line upgrades that were identified in the Feasibility Study, GMP has since informed the Project that it plans to upgrade this distribution line to address system reliability concerns as part of a separate Zero Outage Initiative project (#179250) that SSE understands is happening regardless of whether this Project goes forward. This upgrade is scheduled to be completed in the coming months, prior to the issuance of a CPG for this Project. The 250' line extension from Route 103 into the project site will remain the responsibility of the Project along with a single span of new wire.

Except for the existing line upgrades, SSE will be responsible for the costs to complete all other required system improvements to interconnect the Project, and these improvements will be completed prior to interconnection.

Please specify what upgrades remain Petitioner's responsibility to safely interconnect the project .

Q.DPS.SSE.1-4 Referring to Exhibit SSE-TH-5 on page 12, GMP states that lead times for equipment necessary for the interconnection of the Project are approximately eighty-four (84) weeks. The Department is keenly aware of the narrowing window for renewable projects to take advantage of federal Investment Tax Credits (requiring operation by December 31, 2027). Please explain Savage Solar's expectation of the timing of the Project's interconnecting and operation.

Q.DPS.SSE.1-5 Please list the DC/AC ratio, the expected capacity factor, and the corresponding annual output of the project.

Q.DPS.SSE.1-6 Will any voltage control capabilities of the inverters be enabled to maintain a voltage setpoint at the point of interconnection, or fixed or variable reactive power output? Please explain.

Q.DPS.SSE.1-7 Will pollinator-friendly plants be included in implementation of the vegetation plan for project? If not, why not?

[Signature on the following page.]

Dated at Montpelier, Vermont this 18th day of May 2026

VERMONT DEPARTMENT OF PUBLIC SERVICE

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