

“**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 Green Mountain Power Corporation.

“**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. 26-0651-PET, regarding the rebuilding of the Georgia substation on Ballard Road in Georgia, Vermont.

“**You**” or “**Your**” refers to Green Mountain Power Corporation.

INTERROGATORIES

1. Exhibit GMP JRF-3 depicts areas of tree clearing and the prefiled testimony of Adam Crary at 10 mentions disposing of stumps from grubbing. Attachment 8 of exhibit GMP-AC-2 tallies areas of impact to PAS.
 - a. Please identify areas of tree grubbing.
 - b. Please explain whether those areas to be grubbed are included in the tally of PAS.
2. Please describe the anchors used for new poles and please identify which poles have which type of anchor(s). See Exh GMP JRF-3.
3. Please explain the term “project boundary” in Exhibit GMP JRF-3.
4. Please identify the Limits of Disturbance of the project.

5. With reference to exhibit GMP-AC-2, Attachment 8 gives a tally of proposed impacts of 0.54 acre (temporary 0.17 acre, permanent 0.37 acre) while the same exhibit at 2 states “The total potential for earth disturbance will be less than 1-acre (approximately 41,900 square feet).” Please explain the apparent discrepancy.
6. Please explain why some cells in the PAS tally in Attachment 8 of exhibit GMP-AC-2 are either blank or a zero is entered.
7. For the cells described in question 6, please explain from where those values were derived.
8. Please describe the formula (if applicable) used to calculate the values in each column in PAS tally in Attachment 8 of exhibit GMP-AC-2.

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.

Dated at Montpelier, Vermont this 20th day of May 2026.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
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