

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power Corporation for)
a Certificate of Public Good, pursuant to 30) Case No. 26-0651-PET
V.S.A. § 248, authorizing the rebuild of the)
Georgia Substation located at 2066 Ballard Road)
in the Town of Georgia, Vermont)

ANR's FIRST SET OF INFORMATION REQUESTS ON PETITIONER

The Agency of Natural Resources (“Agency” or “ANR”) by undersigned counsel, hereby serves the following First Set of Information Requests upon Petitioner Green Mountain Power Corporation (“Petitioner” or “GMP”) in accordance with Public Utility Commission Rules 2.214 and 2.230, and requests that Petitioner answer the requests in accordance with Commission Rules 2.214 and 2.230 and deliver its answers and all requested documents and materials to the Agency’s offices as soon as possible but in no case later than June 3, 2026. Petitioner is requested to provide a copy of its answers in electronic format, that is, Microsoft Word or another format readable by the Agency.

INSTRUCTIONS AND DEFINITIONS

1. Reproduce the request being responded to before the response. Provide one complete hard copy of your responses and an electronic copy. All spreadsheets and computer data should also be provided electronically.
2. Responses to any and all Agency requests that are contained herein or that may be filed later should be supplied to the Agency as soon as they become available to Petitioner. That is, Petitioner should not hold answers to any requests for which it does have responsive data, documents, etc., until responses to any or all other requests are compiled.
3. The response to each request should be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.
4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Petitioner's work papers and files or that is otherwise available.
5. These requests shall be deemed continuing. Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
7. Some of the Agency's requests may make particular reference to a portion of a filing in this matter. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Petitioner that is responsive to the questions stated.
8. Documents produced pursuant to these requests shall be organized and labeled in correspondence with the paragraph number to which they are alleged to respond. With respect to each document produced by Petitioner, identify the person who prepared the document and the date on which the document was prepared.
9. If any request to admit is responded to by a denial or an objection, explain in detail the reason for such denial or objection.
10. If in response to any request for information, the responding party asserts attorney client privilege, attorney work product, or any other privilege, please provide in addition to the basis of the privilege the date of the allegedly privileged communication(s), the identity of all persons who were party to the allegedly privileged communication(s) or who received photocopies of such communication(s), and the subject matter of the allegedly privileged communication.
11. 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 it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection.
12. "Document" shall be construed as broadly as possible, and means any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions

or copies which differ in any respect from the original. The term specifically includes and is not limited to written communications such as letters and e-mails.

13. "Identify" means:
 - a. With respect to a natural person with natural person(s) or legal entities other than a natural person, his or her name and present or last known business address;
 - b. With respect to a document, the type of document (e.g., letter, record, list, memorandum, report), date, title, contents; the person who prepared the document, and the person for whom the document was prepared, or to whom it was delivered; the persons who have possession, custody or control over the original and each copy of the document; provided however, that in lieu of identifying the document, you may attach a true and correct copy of the document to your answers; and
 - c. With respect to communication, where the communication occurred, e.g., if not in direct person to person conversation, the place from which each person involved actually participated; and what was said by each person involved during such communication and the order in which it was said. Identify communications in chronological order, when more than one is responsive.
14. "Information Requests" means the Interrogatories and Request for Production served on Petitioner.
15. "Person" means, but is not limited to, natural persons, partnerships, corporations, governmental agencies, boards of directors, and other legal entities.
16. "Person Responsible" means all Persons competent to testify concerning the response and all documents and exhibits produced as part of the response, with either personal knowledge about the Project and/or an expert opinion about the Project
17. "Petition" means all documents, materials, and evidence submitted by Petitioner to the PUC in Case No. 26-0651-PET.
18. "Petitioner" means Green Mountain Power Corporation.

19. "Proceeding" refers to the PUC's review of the Petition in Case No. 26-0651-PET.
20. "Project" means the proposed rebuild of the GMP Georgia Substation, including all related transmission and distribution line work and the removal of the existing Georgia Substation materials and components in Georgia, Vermont, including all earth disturbance, tree cutting, vegetation clearing, improvements to existing access roads, construction of new access roads, and all site preparation, construction, maintenance and decommissioning activities, as described in the Petition.
21. "Project Site" means the areas associated with the new substation construction, the existing substation, all access roads, and all distribution and transmission infrastructure included in the Project.
22. "Property" means all parcels of land that presently do and will host the Project Site.
23. "GMP" means Green Mountain Power Corporation.
24. "PUC" means the Vermont Public Utility Commission.
25. "You" or "your" means GMP.

Interrogatories, Requests to Produce, and Requests to Admit

- Q.ANR:GMP.1-1.** Identify the Person Responsible for responding to each Information Request.
- Q.ANR:GMP.1-2.** Identify each Person consulted by the Person Responsible in responding to each Information Request.
- Q.ANR:GMP.1-3.** Identify each Person – including Person's address – that may provide testimony in this Proceeding in Support of the Petition.
- Q.ANR:GMP.1-4.** Identify all documents Petitioner may rely on and/or offer as an exhibit in the Proceeding in Support of the Petition.
- Q.ANR:GMP.1-5.** Exhibit GMP-AC-2, at page 5, indicates that GMP will obtain a Vermont wetland permit for impacts to 2,080 square feet of Class II wetlands (150 square feet) and buffers (1,930 square feet), attributing the impacts

to “proposed substation yard grading, tree clearing for the overhead utility line, and access road visibility improvements.” These same impacts appear to be described by Adam Crary in his direct testimony dated April 8 2026: 360 sq ft of impact to wetland buffer for the expanded substation (page 12, lines 19-21); 1,570 sq ft of impact to wetland buffer for improved access road visibility (page 12, lines 21-22); and 150 sq ft of impact to wetland for access road visibility (page 12, line 22). However, Mr. Crary also discusses work within wetland and buffer associated with upgrading a section of distribution line from Ballard Road to the rebuilt substation (page 11, lines 16-18 and page 13, lines 1-3) but does not quantify the extent of these impacts. Rather, he appears to describe this work as not involving “new tree clearing beyond normal [line] maintenance” and as work that “will be completed in accordance with ... VWR Allowed Use 6.8.” Please answer the following.

- a. Quantify (in square feet) the extent of impact to Class II wetland associated with upgrading the section of distribution line from Ballard Road to the rebuilt substation (including access).
- b. Quantify (in square feet) the extent of impact to Class II wetland buffer associated with upgrading the section of distribution line from Ballard Road to the rebuilt substation (including access).
- c. Are the impacts quantified in your responses to a. and b. above included in 2,080 square feet of impacts for which GMP will obtain a wetland permit as discussed in Exhibit GMP-AC-2, at page 5?
- d. If these impacts are not included in the 2,080 square feet of impacts for which permit coverage will be obtained, explain why not.
- e. Is the upgrade of the distribution line from Ballard Road to the rebuilt substation necessitated by the Project (i.e., but for the Project, the upgrade would not be necessary)?
- f. Explain the relevance of Mr. Crary's statement that the upgrade of distribution line from Ballard Road to the rebuilt substation will not involve “new tree clearing beyond normal maintenance.”
- g. Is it your position that tree trimming, cutting, or clearing performed in connection with a distribution upgrade attributable to and required by a proposed substation project which requires a certificate of public good where the tree trimming, cutting, or clearing is similar in scope or kind to such activities performed during routine line maintenance is not subject to the Commission's review of impacts under the Section 248(b)(5) natural resources criteria in the context of the substation project review? Explain.

- h.** When did GMP last perform tree trimming, cutting, or clearing in connection with routine line maintenance on the Ballard Road distribution segment?
- i.** When is the Ballard Road distribution segment next scheduled for routine line maintenance involving tree trimming, cutting, or clearing?

- Q.ANR:GMP.1-6.** Have all wetlands located within 50 feet of the proposed upgrade of distribution line from Ballard Road to the rebuilt substation been delineated? If so, indicate when and produce a map of the delineation.
- Q.ANR:GMP.1-7.** If the wetlands located within 50 feet of the proposed upgrade of distribution line from Ballard Road to the rebuilt substation have been delineated, has that delineation been submitted to the Agency's district wetland ecologist for review? If so, when? If not, why not?
- Q.ANR:GMP.1-8.** Will there be any new poles or new line segments installed in connection with the proposed upgrade of distribution line from Ballard Road to the rebuilt substation? If yes, provide the details.
- Q.ANR:GMP.1-9.** Regarding the proposed upgrade of distribution line from Ballard Road to the rebuilt substation, quantify how many square feet of tree clearing is proposed in Class II wetland and buffer zone which is outside of the existing right-of-way and which is for the purpose of site access visibility.
- Q.ANR:GMP.1-10.** On page 12, of his testimony, Mr. Crary indicates that a different portion of the wetland complex was field-reviewed by the Agency's wetland program in 2020 in connection with a different project, but that the new delineation (2023) for impacts associated with this Project have not been field-reviewed by the Agency. Mr. Crary goes on to say the "another site visit should not be necessary, but can be accommodated." Has VHB contacted the Agency's wetland ecologist to arrange a site visit? If not, explain why not, taking into consideration that this is a new delineation related to a new project?
- Q.ANR:GMP.1-11.** When do you intend to submit your wetland permit application?

REQUESTS FOR PRODUCTION

- RTP.ANR:GMP.1-1.** Produce any and all documents identified, referenced, relied upon, or referred to in responding to these interrogatories and requests to admit.

DATED this 20th day of May 2026, at Waterbury, Vermont.

Respectfully submitted,

VERMONT AGENCY OF NATURAL RESOURCES

A handwritten signature in blue ink, consisting of a large, stylized initial 'D' followed by a horizontal line extending to the right.

By:

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