

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0736-PET

Petition of Airport RD1 VT Solar, LLC, pursuant to 30 V.S.A. § 248, requesting a certificate of public good for a 4.975 MW electric generation facility in Fair Haven, Vermont	
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**FIRST SET OF INFORMATION REQUESTS
SERVED UPON AIRPORT RD1 VT SOLAR LLC
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Matthew Bakerpoole, hereby serves this First Set of Information Requests upon Airport RD1 VT Solar, LLC (“ARS”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that Petitioner 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 than **Monday, June 22, 2026**. Please provide ARS’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 ARS is able to provide an answer or production. In other words, ARS should not withhold a response to any requests for which it has responsive data, documents, etc. until ARS 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). ARS must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to ARS. 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 ARS'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 ARS, 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 ARS 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 ARS 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 ARS.

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. “ARS” as used herein, means Airport RD1 VT Solar, 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 ARS’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 ARS’s proposed 4.975 MW solar facility and associated equipment and construction and maintenance activities.
18. “FY,” as used herein, means Fiscal Year.
19. “Department,” as used herein, means the Vermont Department of Public Service.

INTERROGATORIES AND REQUESTS TO PRODUCE

- Q.DPS.ARS.1-1.** Please list the DC/AC ratio of the Project.
- Q.DPS.ARS.1-2.** By what date is the Project planned to be commissioned as in-service and deliver power to the grid?
- Q.DPS.ARS.1-3.** Will pollinator-friendly plants be included in implementation of the vegetation plan for Project? If not, why not?
- Q.DPS.ARS.1-4.** Is it expected that the Project will receive any federal tax credits? Please explain, including any corresponding deadlines for construction or commissioning.
- Q.DPS.ARS.1-5.** Has this Project been submitted to any solicitations for energy procurement? If so, please describe.
- Q.DPS.ARS.1-6.** Page 7 of Mr. Martin's testimony notes ARS’s outreach to the Rutland Regional Planning Commission, indicating that the Rutland Regional Planning Commission has

not commented on the Petition. Is the Project consistent with the Rutland Regional Plan Energy Plan? Please explain why or why not.

Q.DPS.ARS.1-7. Page 11 of Mr. Martin's testimony indicates that an offtaker for the energy produced by the Project has not yet been determined.

- a. Since the April 16 filing of this testimony, has any contract been negotiated for the sale of the energy?
- b. If so, at what rate will the energy be sold?
- c. If not, please explain whether it is expected that the offtaker will be determined prior to commissioning of the facility.

Q.DPS.ARS.1-8. Pages 11 and 12 of Mr. Martin's testimony describe the system improvements required by the Green Mountain Power feasibility study.

- a. 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.
- b. Did Green Mountain Power representatives mention, prior to or during the feasibility study, the potential implementation of any such voltage control settings? If so, please describe the extent of this communication.

Q.DPS.ARS.1-9. The prefilled testimony of Geoff Martin, at 19, states: "If a fence is not installed, energized equipment rated for outdoor use will be secured by locked enclosure covers and compliant with NEC Code 'Guarding of Live Parts.'"

- a. Is the Petitioner able to provide a general statement that the Project will be constructed and operated in accordance with all applicable requirements of the National Electrical Code (NEC)?
- b. When will the Petitioner decide whether a fence will be used and will Petitioner agree to supplement its filings if it decides to use a fence?

[Signature on the following page.]

Dated at Montpelier, Vermont this 29th day of May 2026.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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