

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

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 (AC) electric
generation facility in Fair Haven, Vermont

)
)
)
)
)
)

Case No. 26-0736-PET

**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 Airport RD1 VT Solar, 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 Airport RD1 VT Solar, 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. 26-0736-PET, regarding the solar electric generation facility in Fair Haven, Vermont.

“You” or **“Your”** refers to Airport RD1 VT Solar, LLC

INTERROGATORIES

1. Exhibit PET-SDG-2 at drawing number C-101 depicts two, 2,500-kVA transformers (“EQUIPMENT PAD W/ SWITCH GEAR, 2,500kVA TRANSFORMER, AND SECONDARY OIL CONTAINMENT”) and includes at drawing number C-107 a section titled “Secondary Oil Containment Design for 2,500 kVA Transformer” and “BCI AGENT BARRIER BOOM SPECIFICATIONS.” Exhibit PET-GM-2 at 7-8 shows a transformer.
 - a. Please describe the footprint of each of the transformers.
 - b. With reference to the dimensioned drawing at Exhibit PET-SDG-2, drawing number C-107, please describe whether excavation is proposed for the installation and

placement of the equipment pad, including the placement of the transformer and switchgear.

REQUESTS TO PRODUCE

1. Please produce a cross-section of the equipment pad, including the placement of the transformer and the switchgear.
2. Please produce a cross-section of the proposed underground power depicted in Exhibit PET-SDG-2 at drawing number C-101.
3. Please produce each document that you identified or cited in your responses to these interrogatories.
4. Please produce each document that otherwise supports your responses to these interrogatories.
5. 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 29th day of May 2026.

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

By: /s/ WillyJane Patry
WillyJane Patry
Staff Attorney
Agency of Agriculture, Food and Markets
116 State Street
Montpelier, VT 05620-2901
willyjane.patry@vermont.gov