

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Randolph Davis Solar LLC for a	)	
certificate of public good, pursuant to 30 V.S.A.	)	
§§ 248 and 8010, authorizing the installation and	)	21-2939-NMP
operation of a 500 kW group net-metered solar	)	
electric generation system in Randolph, Vermont	)	

**THE VERMONT AGENCY OF AGRICULTURE, FOOD
AND MARKETS' RESPONSE TO CPG HOLDER'S SELF-REPORT AND
COMPLAINTS**

On April 28 and 29, 2026, a complainant filed complaints with the Department of Public Service (the Department), alleging the improper handling of Primary Agricultural Soils (PAS) in violation of the CPG. The Department promptly referred both complaints to AAFM, and AAFM promptly initiated an investigation into the matter. During AAFM's investigation, to date, AAFM has found no evidence of any soil being trucked off site.

On May 21, 2026, CPG Holder filed a Self-Report of Non-Compliance of the CPG, in which it responded to many of the violations alleged in the April 28 and 29 Complaints. CPG Holder has proposed some conceptual solutions to mitigate the impacts to PAS.

On May 27, 2026, Complainant filed a third complaint with the Department, relating to the prior complaint about improper handling of PAS along with additional allegations relating to storm water. AAFM is addressing the allegations related to PAS.

CPG Holder has expressed its willingness to cooperate with AAFM in developing a plan to remedy the remaining concerns raised in the complaints and in CPG Holder's May 21, 2026 Self-Report. AAFM continues to monitor the situation and is in communication with CPG Holder regarding possible solutions to properly restore and/or mitigate any impacted PAS.

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

By: /s/ WillyJane Patry
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