

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power for a Certificate
of Public Good, pursuant to 30 V.S.A. § 248,
authorizing the rebuild of the Georgia Substation
located at 2066 Ballard Road in the Town of
Georgia, Vermont

)
)
)
)
)
)

Case No. 26-0651-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 Green Mountain Power (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 Green Mountain Power.

“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 substation in Georgia, Vermont.

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

INTERROGATORIES

1. Please refer to Exhibit GMP JRF-3 and please describe how the existing poles P105X and P105XA are anchored.
2. Referring to the fiber runs shown in above-named exhibit:
 - a. Please describe whether any of the fiber runs (existing, proposed temporary, and proposed permanent) are underground or overhead.
 - b. If any of the fiber runs are underground, please describe:
 - i. the typical excavation depth to remove the existing fiber and the removal technique and machinery that you will use.
 - ii. The typical excavation depth of the temporary and permanent fiber and the techniques and machinery used to install these. In the case of temporary

underground fiber please describe the technique and machinery you will use to remove it at the end of construction.

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.
4. Please produce any guidance documents that you will rely on relating to this project's installation and reclamation, including any associated environmental management plans.

Dated at Montpelier, Vermont this 1st day of July 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 St
Montpelier, VT 05620-2901
802-261-1861
willyjane.patry@vermont.gov