

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Novus Buck Solar LLC for a Certificate)	
of Public Good, pursuant to 30 V.S.A. § 248,)	
authorizing the installation and operation for a)	
4.999 MW ground-mounted solar array in Newport)	Case No. 26-0925-PET
Town, Vermont to be known as the “Novus Buck)	
Solar Project”)	

**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 Novus Buck 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 Novus Buck 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. 26-0925-PET, regarding the ground-mounted solar-electric generation facility to be known as the “Novus Buck Solar Project” in in Newport Town, Vermont.

“You” or **“Your”** refers to Novus Buck Solar LLC.

INTERROGATORIES

1. Please identify, as defined above, the area in the northwest area of the project that is within the soil map unit 26D, within the proposed limits of disturbance, and is currently used or has recently been used for agricultural activities.
 - a. For this area:
 - i. Identify and describe each type of potential earth disturbance.
2. The prefiled testimony of Seth Goddard at 6 states “The site will be graded to the approximate finish grades shown and reclaimed by the gravel pit owner with seed and mulch prior to the Project construction (seeding will be temporary if reclamation occurs within two months of Project construction, with final seeding to occur after Project construction).”

- a. Please identify and describe any material piled on site that will be used to reclaim the gravel pit.
- b. Please identify and describe the mulch that will be used in reclamation, specifically the composition of the mulch and the depth to which it will be applied on the site.

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.

Dated at Montpelier, Vermont this 24th day of July 2026

STATE OF VERMONT
AGENCY OF AGRICULTURE, FOOD
AND MARKETS

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