

**Respondent's Supplemental Discovery Response
to the Town of Irasburg's First Set**

Q.7. Are the two wind turbines currently sited on your Kidder Hill property grid-connected?

A.7. Objection to the request on grounds that this request is misdirected to a different party, "Petitioner Next Generation Solar Farm, LLC" (see Definitions ¶¶ 2, 5).

Further objection on grounds that the request is not relevant to or reasonably calculated to lead to the discovery of admissible evidence on whether the Respondent was required to obtain a certificate of public good for the meteorological mast he installed on his property in Irasburg, Vermont.

Notwithstanding and without waiving the objection, Respondent response:

Yes. The two wind turbines on my Kidder Hill property are net metered.

Supplemental Response 12/6/2019:

The wind turbines were removed from the property in early November 2017 and have not been operating or grid-connected since that time.

**Respondent's Supplemental Discovery Responses
to the DPS's First Set**

Q.DPS:Resp.1-11: Please admit or deny that Mr. Blittersdorf has continuously served as majority owner and/or managing partner of Georgia Mountain Community Wind since December, 2011 to date.

- a. If Respondent's response is not "admit" please identify and list any and all dates when Mr. Blittersdorf was not serving as majority owner and/or managing partner of Georgia Mountain Community Wind since December, 2011 to date.

Q.DPS:Resp.1-11: Admit in part and deny in part. Admit that I have been majority owner and/or managing partner of Georgia Mountain Community Wind since around the timeframe noted, but deny that my ownership interest was acquired in December 2011. Although I stated in my prefiled testimony in this docket that I had been an owner since December 2011, I have since reviewed my files and can confirm that I closed on my purchase of an ownership interest in Georgia Mountain Community Wind on January 17, 2012. Enclosed for your files is a replacement page 1 of my December 18, 2015 testimony. (See Bates 8585-DPS-01.) I amended the sentence in lines 10-12 from "In December 2011, I became managing member of Georgia Mountain Community Wind, LLC and I am majority owner of the Georgia Mountain Wind Project" to "On January 17, 2012, I became managing member of Georgia Mountain Community Wind, LLC and majority owner of the Georgia Mountain Wind Project."

Supplemental Response 12/6/2019:

I am no longer majority owner and/or managing partner of Georgia Mountain Community Wind effective as of December 21, 2017.

**Respondent's Supplemental Discovery Responses
to the DPS's First Set**

Q.DPS:Resp.1-8: Please identify and list any and all additions, removals, and/or modifications to the MET Tower measurement instrumentation/equipment since the MET tower began collecting and/or transmitting data.

A.DPS:Resp.1-8: The only modifications are those identified in A.DPS:Resp.1-7, which were made in connection with the December 4, 2015 repairs.

Supplemental Response 12/6/2019:

In May 2018, I upgraded the met mast with an AllEarth Renewables product.

**Respondent's Supplemental Discovery Responses
to the DPS's First Set**

Q.DPS:Resp.1-7: Please identify and list any and all interruptions in data collection lasting more than one week (seven days) since the MET tower began collecting and/or transmitting data.

A.DPS:Resp.1-7: One of the residential wind turbines needed to be taken down for repairs briefly on December 4, 2015, so we also briefly took down the met mast to do repairs to two of the sensors on it and to fix some bad bearings. Other than that, data collection has been 100 percent. It is a point of pride for me that I make very reliable wind data collection instruments.

Supplemental Response 12/6/2019:

Data collection from the met mast was interrupted for approximately one week when I upgraded it in May 2018.

The foregoing supplemental discovery responses are true and accurate to the best of my knowledge and belief.



David Blittersdorf

STATE OF VERMONT
COUNTY OF CHITTENDEN, SS.

On this 6TH day of December, 2019, personally appeared David Blittersdorf, known to me or satisfactorily proven to be the person who is the signatory to the foregoing, and swore to the truth of the foregoing statements.

Before me,



Notary Public

My commission expires: 1/31/2021

JOYCE A. DICIANNA
Notary Public
VERMONT

