

2016 FEB 24 PM 3 46

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 8585

Investigation into Meteorological Tower at) February 24, 2016
700 Kidder Hill Road in Irasburg, Vermont)

SECOND SET OF INFORMATION REQUESTS
SERVED UPON RESPONDENT
BY THE DEPARTMENT OF PUBLIC SERVICE

The Department of Public Service (the "Department" or "DPS") by: Aaron Kisicki, Special Counsel, hereby serves the following Second Set of Information Requests upon David Blittersdorf, LLC ("Respondent") in this matter in accordance with Public Service Board Rule 2.214 and V.R.C.P. 33 and 34, and requests that Respondent answers the requests in accordance with V.R.C.P. 33 and 34 and deliver its answers and all requested documents and materials to the Department's offices in Montpelier not later than **March 25, 2016**. Respondent is requested to provide two complete copies of all documents. Respondent also requested to provide a copy of its answers in electronic format, that is, Word or other format readable by the Department, and to provide any spreadsheets in electronic format.

INSTRUCTIONS

1. Reproduce the request being responded to before the response per V.R.C.P. 33.
2. Responses to any and all Department requests that are contained herein or that may be filed later should be supplied to the Department as soon as they become available to Respondent. That is, Respondent should not hold answers to any requests for which they have responsive data, documents, etc. until responses to any or all other requests are compiled.
3. V.R.C.P. 33 requires the response to each request to be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the

answer was prepared; and (3) the date on which each question was answered.

4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Respondent's workpapers and files or that is otherwise available.
5. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). Respondent is directed to change, supplement and correct its answers to conform to all information as it becomes available to Respondent, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.
6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
7. Some of the Department's requests may make particular reference to a portion of Respondent's filing. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Respondent that is responsive to the questions stated.
8. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.
9. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. All spreadsheets provided must have all formulae intact and accessible.
10. "Petition," as used herein, means Petitioner's petition filed with the Vermont Public Service Board in this docket, unless the context indicates otherwise.
11. With respect to each document produced by Respondent, identify the person who prepared the document and the date on which the document was prepared.
12. If any interrogatory or request requires a response that Respondent believes to be privileged, please state the complete legal and factual basis for the claim of privilege, provide the information required by the 5/16/95 order in Docket No. 5771 and respond to the parts of the interrogatory or request as to which no privilege is asserted.
13. If any interrogatory or request is objected to in whole or in part, please describe the

complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject-matter of the document as well as the complete legal and factual basis for the objection.

14. To expedite the discovery process and the resolution of this docket, Respondent should contact the Department as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.
15. The Department reserves the right to submit additional information requests to Respondent.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS:Resp.2-1: Please admit or deny that Mr. Blittersdorf is and/or has been a member of the Renewable Energy Vermont ("REV") Board of Directors.

- a. If Respondent's response is "admit," please list the dates when Mr. Blittersdorf was a member of the REV Board of Directors.

Dated at Montpelier, Vermont this Twenty-Fourth day of February, 2016.

VERMONT PUBLIC SERVICE DEPARTMENT

By:



Aaron Kisicki
Special Counsel

cc: Docket No. 8600 Service List
Public Service Board

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Department of Public Service
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February 24, 2016

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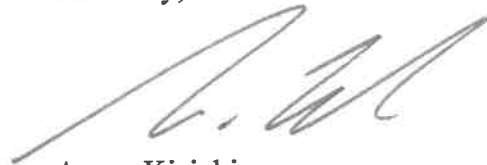
Re: Docket No. 8585 – Kidder Hill MET Tower Investigation

Leslie and Alison:

Enclosed please find the Public Service Department's Second Set of Information Requests in regard to the above-referenced proceeding.

Thank you for your time and attention to this matter. Please contact me with any questions or concerns.

Sincerely,



Aaron Kisicki
Special Counsel

cc: Docket 8585 Service List (w/ enclosure)
Public Service Board (w/ enclosure)

