

STATE OF VERMONT
PUBLIC SERVICE BOARD

VERMONT PUBLIC
SERVICE BOARD

2016 JUN 29 PM 2 33

Docket No. 8585

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

NOTICE OF DEPOSITION

TO:

Geoffrey Commons, Esq.
Aaron Kisicki, Esq.
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620-2601

Dr. Robert R. Holland
P.O. Box 88
4328 Route 14
Irasburg, VT 05845

Leslie Welts, Esq.
Vermont Agency of Natural Resources
One National Life Drive, Davis 2
Montpelier, VT 05620-3901

Irasburg Select Board
P.O. Box 51
Irasburg, VT 05845

PLEASE TAKE NOTICE that the Respondent in the above-captioned action, by his attorneys, Legal Counselors & Advocates, PLC, will take the deposition *duces tecum* of the Town of Irasburg, Vermont pursuant to Rule 30(b)(6) of the Vermont Rules of Civil Procedure, by the representative(s) authorized to speak on its behalf who is most knowledgeable with respect to the topics enumerated on the List of Topics below, on July 15, 2016, or such other date as is negotiated by the parties, commencing at 2:00 pm

in the Boardroom, Capital Plaza Hotel, 100 State Street, Montpelier, Vermont before a duly authorized court reporter. The Town of Irasburg is directed, as required by Rule 30(b)(5) of the Vermont Rules of Civil Procedure, to produce for use at the deposition, to the extent not already produced, the documents listed on the List of Documents, below. The deposition may also be videotaped. Oral examination will continue from day to day until completed. You are invited to attend and cross examine.

List of Topics

1. The inclusion on the Irasburg 2016 Grand List, effective April 1, 2016, of the meteorological tower installed at 750 Kidder Hill Road in the valuation of real estate having the SPAN number 312-099-10626, including the basis for the \$34,000 increased property value attributed to the meteorological tower installation.
2. The content of the documents produced in response to document requests #1, 4, 5, and 6 in the List of Documents below.
3. The benefits to the Town of Irasburg from the installation of the met tower installed at 750 Kidder Hill Road with the SPAN number 312-099-10626. '
4. The negative impact to the Town of Irasburg from the installation of the met tower installed at 750 Kidder Hill Road with the SPAN number 312-099-10626.
5. The environmental impacts from the installation of the met tower installed at 750 Kidder Hill Road with the SPAN number 312-099-10626.

6. The relationship between the Irasburg Select Board and the Irasburg Ridgeline Alliance with respect to (1) Public Service Board Docket 8585, and (2) the met tower installed at 750 Kidder Hill Road with SPAN number 312-099-10626.
7. The content of all meetings between the Irasburg Select Board and one or members of the Irasburg Ridgeline Alliance that occurred in any location in Vermont between July 1, 2015 and July 30, 2016 where the met tower installed at 750 Kidder Hill Road with SPAN number 312-099-10626 was discussed.
8. The content of all meetings between the Irasburg Select Board and one or members of the Irasburg Ridgeline Alliance that occurred in any location in Vermont between July 1, 2015 and July 30, 2016 where the Public Service Board proceeding in Docket 8585 was discussed.
9. The scope of authority granted by the Irasburg Select Board to Ron Holland in connection with the Town of Irasburg's participation as a party in Public Service Board Docket 8585.
10. David Blittersdorf's compliance with orders, rules, and regulations of (a) the Public Service Board, (b) any Department or Division of the Agency of Natural Resources, (c) the Natural Resources Board, (d) any Vermont municipal zoning authority, and (e) any Act 250 District Environmental Commission.

List of Documents

1. All public records, including e-mails and text messages, that contain communications between one or members of the Irasburg Select Board and one or more of Irasburg Listers concerning the met tower installed at 750 Kidder Hill Road with the SPAN number 312-099-10626.
2. Minutes of Irasburg Select Board meetings from January 1, 2012 through July 30, 2016 at which the met tower installed at 750 Kidder Hill Road with the SPAN number 312-099-10626 was discussed.
3. Minutes of Irasburg Select Board meetings at which the above-captioned proceeding (Docket 8585) was discussed.
4. Documents explaining, establishing, identifying, enumerating or otherwise specifying the bounds of authority granted to Ron Holland to act as the Irasburg's Select Board's representative in Public Service Board proceeding, Docket 8585.
5. Documents in the possession, custody or control of the Town of Irasburg that pertain to David Blittersdorf's compliance with orders, rules, and regulations of (a) the Public Service Board, (b) any Department or Division of the Agency of Natural Resources, (c) the Natural Resources Board, (d) any Vermont municipal zoning authority, and (e) any Act 250 District Environmental Commission.

6. Reports pertaining to the subject matter of the investigation in this Docket No. 8585 from Ron Holland to one or more members of the Irasburg Select Board.

Dated at Castleton, Vermont this 29th day of June, 2016.



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