

RESPONDENT'S SUPPLEMENTAL STATEMENT OF UNDISPUTED MATERIAL
FACTS AND SUPPLEMENTAL CITATIONS FOR RESPONDENT'S JULY 29, 2016
STATEMENT OF UNDISPUTED MATERIAL FACTS

Respondent's Supplemental Undisputed Material Facts ("RSUMF")

1. Mr. Blittersdorf purchased property in Irasburg, Vermont in October, 2010 where he intended to build a log cabin that was powered by one or more small wind turbines. Blittersdorf pf. at 2.
2. Mr. Blittersdorf has been studying wind since he was a child and he has been testing wind measuring devices since he was a teenager. Blittersdorf pf. at 4.
3. Mr. Blittersdorf is an inventor of wind assessment technology and holds 2 patents. Blittersdorf pf. at 1.
4. The instrumentation attached to the met mast when it was installed consisted of a lightning rod, multiple levels of wind direction vanes, wind speed anemometers and a heated anemometer, a data 2 logger (approximately 1.5 square feet) and a 250-watt, approximately 3' x 5' solar 3 panel located near the bottom of the mast. Blittersdorf pf. at 4; Exhibit DB-2.
5. Met masts are not a necessity for the installation of wind turbines. Wind turbines can and have been installed in Vermont without a met mast first being installed and operated to evaluate the viability of a site for the turbines. Deposition of Ron Holland 8/5/2016 at 11:15-19; Deposition of Andrew Perchlik 8/5/2016 at 30:8 to 30:16 and 33:24 to 34:4.
6. A met tower and data from a met tower are not needed to operate residential wind turbines, and larger megawatt size turbines are operated by anemometers that work in conjunction with the turbine. Deposition of Andrew Perchlik 8/5/2016 at 40:16 to 41:11; Deposition of Robert Holland, 8/5/2016 at 25:7.
7. There are alternatives for evaluating wind resources at different locations throughout Vermont, including LIDAR, which measures wind speed and wind direction, as well as publicly available data on state wind resources and wind

mapping. Deposition of Andrew Perchlik, 8/5/2016 at 35:24 to 36:22 and 73:4-6;
Deposition of Robert Holland, 8/5/2016 at 11:15-19.

Supplemental Citations for Respondent's July 29, 2016 Statement of Undisputed Material Facts ("SOUMF")

SOUMF #4 Affidavit of David Blittersdorf August 10, 2016 at ¶¶ 2, 3 and Attachments 1 & 2 ("Blittersdorf Aff. 8/10/2016")

SOUMF #5 Blittersdorf Aff. 8/10/2016 at ¶¶ 2, 3 and Attachments 1 and 2