

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Case No. 16-0042-NMP

**Application of Orchard Road Solar I, LLC)
for a certificate of public good, pursuant to)
30 V.S.A. §§ 219a and 248, for a 500 kW)
interconnected group net-metered)
solar electric generation system in)
Middletown Springs, Vermont)**

**NEIGHBORS' INTERROGATORIES,
REQUESTS TO PRODUCE and
REQUESTS TO ADMIT**

NOW COME Richard Spitalny, Robert & Karen Galloway, Daniel McKeen & Ellen Secord, and Neil & Thomas Russell, by and through their attorney L. Brooke Dingledine, Esq. of the firm Valsangiacomo, Detora & McQuesten, P.C. and hereby propounds the following Set of Interrogatories, Requests to Produce, and Requests to Admit upon Applicant Orchard Road Solar I, LLC ("ORS" or "Applicant"), to be answered under oath and in accord with V.R.C.P. 26, 33, 34, 36 and served on the Neighbors on or before May 5, 2017 pursuant to the PSB's March 27, 2017 Scheduling Order. Insofar as any request to produce a document or thing is concerned, the same shall be produced at the law offices of Valsangiacomo, Detora and McQuesten, 172 North Main Street, Barre, Vermont, 05641, on or before May 5, 2017.

**VALSANGIACOMO,
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P. O. BOX 625
BARRE, VERMONT 05641
802-476-4181**

I. DEFINITIONS AND INSTRUCTIONS

The full text of the definitions and rules of construction set forth below is incorporated by reference into all interrogatories, but shall not preclude (i) the definition of other terms specific to the particular proceeding, (ii) the use of abbreviations or (iii) a more narrow definition of a term defined below. The following definitions apply to all interrogatories:

- A. **COMMUNICATION.** "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise). The term includes but is not limited to oral discussions and written correspondence.
- B. **DOCUMENT.** "Document" is defined to be synonymous in meaning and equal in scope to the usage of the term in Vermont Rule of Civil Procedure 34(a). Please note that a draft or non-identical copy is a separate document within the meaning of this term.
- C. **IDENTIFY. (With Respect to Persons).** A request "to identify" a person means to state (to the extent known) the person's full name, telephone number, last known address, and last known place of employment. Once a person had been identified in this manner, only that person's name need be listed in response to subsequent requests calling for the identification of that person.
- D. **IDENTIFY. (With Respect to Documents).** A request "to identify" a document means to give the following information (to the extent known): (i) the type of document; (ii) its general subject matter; (iii) its origination date; (iv) its author(s), addressee(s) and recipient(s); (v) its present location and/or custodian; and (vi) if the document is claimed to be protected from discovery by privilege, the grounds on which the privilege is claimed. Please note that as an alternative to identifying a document, you may instead simply produce a complete and legible copy.

- E. YOU. "You" means the party to whom the question or request is directed, and, where applicable, its agents, representatives, contractors, consultants, experts, officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.
- F. AND/OR. The phrase "and/or" means either or both.
- G. PERSON. "Person" means any natural person or any business, legal or governmental entity or association.
- H. RELATE TO. The phrase "relate to" means concern, refer to, describe, evidence or otherwise constitute.
- I. PROJECT. The phrase "project" means the planning, siting, construction, maintenance and operation of a 500 kW interconnected group net-metered solar electric generation system in Middletown Springs, Vermont that is the subject of the above captioned Application by Orchard Road Solar I, LLC for a Certificate of Public Good.
- J. APPLICATION. The phrase "Application" means all substantive submissions to the Public Service Board relating to Orchard Road Solar I, LLC's Application for a Certificate of Public Good.

In answering you must furnish all information requested including all information in your possession and control, and that which is under the possession and control of your attorney, agents, employees, contractors and investigators.

If you are unable to fully answer any or all of these interrogatories, state your answer to the fullest extent possible including any information or knowledge you have, and specify what you are unable to answer.

**INTERROGATORIES, REQUESTS TO PRODUCE and
REQUESTS TO ADMIT**

1. Please produce or make available for inspection and copying any reports of investigations made or commissioned by the Applicant concerning the Project, the Project Site, the Querrey's 126 acre tract upon which the Project is sited, any other land owned by Querrey or others within the Town of Middletown Springs and within a 5 mile radius of the Site, or any other alternative project sites.
2. Identify each person whom you expect to call as an expert witness at the time of trial.
3. State the subject matter on which each expert is expected to testify.
4. State the substance of the facts and opinions as to which each expert is expected to testify.
5. State, in summary, the grounds for each opinion to be expressed by each expert.
6. Please produce copies of any and all reports issued by each expert which contain any opinions to be expressed by the expert.
7. Please produce copies of any and all exhibits that may or will be used to summarize or support the opinions of each expert.
8. Please produce copies of any and all documents or other materials provided to, reviewed by, or relied upon by each expert in forming his or her opinions.

Criterion 8 – Aesthetics and Scenic or Natural Beauty

9. The expert stated, "Our analysis, is significantly informed by overall societal benefits of the project." What overall societal benefits are being referred to? How did the expert consider "societal benefits" in determining that the project does not have an undue adverse impact on the area's aesthetics and scenic or natural beauty?

10. Please quantify any financial benefits from the Project including specific dollar amounts: of any municipal and education taxes to be paid per year and total over the life of the project; of the total cost of all contract fees to be paid to Vermont consultants for development work; of the total cost of equipment to be purchased for the Project from Vermont companies; and, of the total cost of all contract fees to be paid to local businesses for construction and installation work.

11. Please admit that the visual context of the area surrounding the Project is “beautiful” or “scenic.” If denied, please state the factual basis therefore.

12. The expert stated, “We evaluated these technical factors (where can it be seen, what it would look like, etc.) against the qualities and sensitivities of the visual environment.” Please describe what the project will look like and what you consider the “sensitivities of the visual environment” to be in the vicinity of the project.

13. Under the heading Views from Public Vantage Points, the expert described how topography and hillsides diminish visibility. Please explain how so? Are there any hillside locations overlooking Burnham Hollow where the topography accentuates visibility rather than diminishes visibility?

14. The expert stated, “There are several residential properties in the vicinity of the project that may have views of the Project, predominantly from the opposite hillside north of Route 140. The residential clusters have intermittent views of the Project as the topography and existing vegetation both near the project site and near the residences will interrupt clear views of the project.” Please admit that each of the following residential properties visited during the April 10, 2017 site visit have direct views of the project site, uninterrupted by topography and existing vegetation:

Neil Russell (240 West St.)

Julie Sperling and Doug Freilich (22 Sundog Lane)

Tom Russell (300 West St.)

Dan McKeen and Ellen Secord (320 West Street)

The meadow owned jointly by six neighbors on Rocks & Trees Lane

Rob and Karen Galloway (89 Norton St.)

Ted and Dina Fitzpatrick (59 Wescott Rd)

Richard Spitalny (67 Wescott Rd).

If any are denied, please provide the factual basis therefore.

15. What is the topography of the site and surrounding area like?

16. The expert stated that “The particular hillside where the Project sits does have some scenic value because of its function as part of the greater landscape.” What criteria were utilized to determine that the project site has “some scenic value?” Please describe the project site’s function in the greater landscape.

17. Please admit that the project site has “particular scenic value.” If

denied, please state the factual basis therefore.

18. Please admit that the project is set on a site that has long-range views which have “high scenic qualities”. If denied, please state the factual basis therefore.

19. Please admit that each of the following residential properties north of the proposed project and visited during the site tour has particular scenic value:

Neil Russell (240 West St.)
Julie Sperling and Doug Freilich (22 Sundog Lane)
Tom Russell (300 West St.)
Dan McKeen and Ellen Secord (320 West Street)
The meadow owned jointly by 6 neighbors on Rocks & Trees Lane
Rob and Karen Galloway (89 Norton St.)

If any are denied, please state the factual basis therefore.

20. Please admit that the project’s design is not compatible with its surroundings. If denied, please provide the factual basis therefore.

21. Please admit that the architectural style of the project is not compatible with buildings in the area. If denied, please provide the factual basis therefore.

22. What structures exist in the area? Did you conduct an inventory of structures in the area? If so, please produce copies of such inventory.

23. Please describe the architectural style of buildings in the area and the architectural style of the proposed project.

24. Please admit that the architectural styles of the buildings in the area and the proposed project are dissimilar and/or contrast with one another. If denied, please provide the factual basis therefore.

25. Please describe the project’s overall physical dimensions (height (from ground level), length, and width of the proposed array).

26. Please describe the project’s scale. Please admit that the scale of the project is not appropriate to its surroundings. If denied, please provide the factual basis therefore.

27. Please describe the project’s mass. Please admit that the mass of the structures proposed for the site are inconsistent with land use and density

patterns in the area. If denied, please provide the factual basis therefore.

28. Please describe the dimensions (height, length, and width), scale, and mass of a sampling of buildings in the area?

29. Please admit that the project is dissimilar in dimension, scale and mass to buildings in the area. If any part is denied, please provide the factual basis therefore.

30. Please describe the colors and materials selected for the project as seen from all viewpoints or directions.

31. Please describe the colors and materials of buildings in the area.

32. Please admit that the colors and materials of the project are dissimilar or contrasting with the buildings in the area. If denied, please provide the factual basis therefore.

33. Please admit that the Project is not suitable for the context in which it will be located. If denied, please provide the factual basis therefore.

34. Please admit that the style, color, scale and mass of the existing buildings in the area contribute to the scenic beauty of the area. If any are denied, please provide the factual basis therefore.

35. Are there any existing structures in the vicinity that diminish the area's scenic beauty? If so please list and describe their address and location.

36. Please admit that the project detracts from the area's scenic beauty. If denied, please provide the factual basis therefore.

37. Please admit that the project's colors do not fit with the buildings in the area. If denied, please provide the factual basis therefore.

38. Please describe the views toward the project site, from each of these neighboring properties: Neil Russell (240 West St., Julie Sperling and Doug Freilich (22 Sundog Lane), Tom Russell (300 West St.), Dan McKeen and Ellen Secord (320 West Street), the meadow owned jointly by six neighbors on Rocks and Trees Lane, and Rob and Karen Galloway (89 Norton St.), Ted and Dina Fitzpatrick (59 Wescott Rd)?

39. Please admit that each of the properties listed in the preceding interrogatory are areas of "high visibility" of the project. If denied, please describe the level of visibility of the project and provide the factual basis therefore.

40. Presently, is there anything you deem “unattractive” in these properties’ views?

41. Will the project be in the foreground, middleground or background of the view from each of these properties?

42. From these properties, will the view of the project be of long or short duration? Will viewers likely be stationary at these properties, so that the view is of long duration or will the viewer be moving quickly by the site so that the length of view is short?

43. Please admit that the project does not “fit” in each of these views and will appear to be “out of context.” If denied, please provide the factual basis therefore.

44. Please admit that the project area is a “specific scenic resource of Vermont.” If denied, please provide the factual basis therefore.

45. Please admit that the Project will contribute to the loss of open space in the area. If denied, please provide the factual basis therefore.

46. Please admit that the project site as it exists today is considered “open space”? If denied, please provide the factual basis therefore.

47. Please admit that the site as it exists today is considered part of a greater open space? If denied, please provide the factual basis therefore.

48. The application described that after construction is complete; the ground will be seeded and maintained as a meadow, being mowed once or twice annually. Will the completed project resemble a meadow? How so?

49. The expert states that the project will not result in a long-term loss of open space in the region. Define what you mean by long-term. At what point (how much time must pass) before the loss of open space changes from short-term to long-term?

50. Please admit that the project will contribute to a sense of loss of open space for the neighboring properties we visited on the April 10th site visit, for the duration of the existence of the project on the site. If denied, please provide the factual basis therefore.

51. The expert states that the project site is not identified for conservation in the Town or Regional plans. Are there any properties not identified for conservation in Town or Regional plans that are vulnerable to

projects having adverse and undue adverse visual impacts on their scenic beauty?

52. The expert states that the Project does alter the existing conditions and use of the site and that the site is scenic. What specific characteristics does the project exhibit that cause you to conclude its aesthetic impacts on the visual resources of the area are adverse?

53. From the perspective of the neighbors on the north side of Burnham Hollow, what will the visual effect of the proposed mitigation planting be on the project at the time of installation?

54. The expert states that topography of the surrounding landscape and existing vegetation helps diminish the visual impact of the Project. Having visited the residential properties on the north side of Burnham Hollow, do the topography and open meadows diminish or heighten the visual impact of the project from the north side of Burnham Hollow? Why? How so?

55. What are the dimensions of the slim, gray mounting brackets that are referred to as one of the mitigating steps you've taken to improve the harmony of the proposed project with its surroundings?

56. What are the dimensions and colors of "regular" mounting brackets?

57. Please admit that the materials of the solar panels are not similar in any way to the existing hillside environment. If denied, please provide the factual basis therefore.

58. Under mitigative zone A the expert states that visibility of new trees may be limited at first. Please define what you mean by "limited"? What height will they be when they're planted? How tall will they need to grow to screen the panels? What is the rate of growth expected? What are the maximum heights of the trees expected to be?

59. Please describe how long it will take for the trees to reach a height that will effectively screen the solar array from the neighbors' views from across the valley. Please specify what portion or percentage of the solar array will be effectively screened from the across-the-valley-neighbors' view each year of the project.

60. The expert states that the grade of the site currently rises 30-40 ft. above the tops of the existing evergreens. Do the 9 ft. tall panels therefore project 39-49 ft. above those evergreen tops? If not, how high above the

evergreen tops will the panels project? Please explain how you came up with those measurements.

61. Please admit that a topographic cross-section from the north side of Burnham Hollow across the Poultney River through the project site including properly scaled trees located north of the project and solar panels stepping uphill to the south would help clarify the effectiveness of the proposed mitigation? If denied, please provide the factual basis therefore.

62. The expert states, "We do not believe that the project would offend the average person. Its scale, mass and form are not so out of character that they are offensive nor do they diminish or distract from the scenic qualities of the area." Please describe how the project's scale, mass and form are in harmony with the existing character of the area and how you determined "the area" used for this project (as described in Criterion 8)?

63. Who is the average person? Are any of the Intervenors an "average person"? If so, who? Are any of the

64. Please admit that the area has "historic character"? If denied, please provide the factual basis therefore.

65. Please admit that the word "industrial" is an accurate description of the project's character. If denied, please provide the factual basis therefore.

66. The expert states that the project is set on a site that does not permanently degrade or diminish long-range views, which are noted for having high scenic qualities. Please admit that the project temporarily degrades or diminishes long-range, highly scenic quality views so long as the project occupies the site. If denied, please provide the factual basis therefore.

67. The expert states that impacts to adjacent residential properties, while not necessarily reflective of "average persons," are minimized by the retention of existing vegetation and the addition of the mitigative steps. On April 10th we visited the lands of neighbors, Neil Russell (240 West St.), Julie Sperling and Doug Freilich (22 Sundog Lane), Tom Russell (300 West St.), Dan McKeen and Ellen Secord (320 West Street), the meadow owned jointly by six neighbors on Rocks and Trees Lane, Rob and Karen Galloway (89 Norton St.), Ted and Dina Fitzpatrick (59 Wescott Rd) and Richard Spitalny (67 Wescott Rd). When one views the project site from each of these locations, approximately what percentage of the visual impact will be minimized by the existing vegetation, what percentage will be minimized by the mitigative landscaping and what percentage of the project will not be minimized?

68. The expert states that the project doesn't introduce secondary factors which often can contribute to how a project "fits" into its setting (traffic, noise, exterior lighting, dust, odors, glare or other nuisances which often are at the root of public objections). Which of these factors are not addressed by the Quechee test?

69. Will the solar array's metal framework be able to reflect sunlight?

70. The expert states that SEGroup believes that the Project has addressed its setting in a very balanced way and it has chosen a setting that provides visual isolation for the project and limits impact to the extent practical. Please admit that the setting does not provide "significant visual isolation" from the lands of neighbors, Neil Russell (240 West St.), Julie Sperling and Doug Freilich (22 Sundog Lane), Tom Russell (300 West St.), Dan McKeen and Ellen Secord (320 West Street), the meadow owned jointly by six neighbors on Rocks and Trees Lane, Rob and Karen Galloway (89 Norton St.), Ted and Dina Fitzpatrick (59 Wescott Rd), Richard Spitalny (67 Wescott Rd), and Route 140 and other public and private roads. If denied, please provide the factual basis therefore.

71. Please admit that the project site is located in the middle ground of the view from most of the neighbors' homes, which viewshed also contains the Coy Mountain Ridgeline as the backdrop. If denied, please provide the factual basis therefore.

72. How is it that "due to the topography and existing vegetation, the Project is generally screened from the majority of public vantage points and residences"? Please list all public vantage points and residences that you were referring to.

Criterion 8 - Noise

73. Please detail Seth D. Goddard's background, education, training and experience that qualifies him to testify as a Sound expert or acoustical engineer. Please list any previous expert testimony provided to a Vermont tribunal related to sound studies and predicting levels of noise at the project site.

74. What are the U.S. Environmental Protection Agency's residential noise guidelines? How does the proposed project comply with such guidelines?

75. What are the Vermont PSB and Act 250 noise standards? Please describe the actual numerical dBA limits and how they are applied.

76. Please describe the duration of the sound levels predicted at the site and at the adjacent properties from the solar array.

77. Please describe how you accounted for “the attenuation of sound over distance” in predicting sound levels.

78. Please describe how if, according to the manufacturer’s specifications, each inverter generates 65 dBA at a 1-meter distance, the expert opined that 21 inverters will generate a combined 65 dBA at a 1-meter distance, a combined 55.5 dBA at 3 meters, and a combined 32 dBA at “Building C Nearest Residence.” Please correct these opinions if they are stated incorrectly and provide the mathematical calculations supporting the expert’s opinions.

79. Please describe how if, according to the manufacturer’s specifications, each transformer generates 55 dBA at a 1-meter distance, the expert opined that 3 transformers will generate a combined 45.5 dBA at 3 meters, and a combined 14 dBA at “Building C Nearest Residence.” Please correct these opinions if they are stated incorrectly and provide the mathematical calculations supporting the expert’s opinions.

80. What Vermont caselaw supports your expert opinion?

Criterion 8 - Historic Sites

81. Please list and describe all buildings or structures in the surrounding area that were considered to be historic with regard to the analysis of historic sites.

82. Please describe any technical analysis, study, documentation, or correspondence related to the development of the Area of Potential Effect (APE) for Historic Sites and Architectural / Built Environment Resources, including consideration of both indirect and direct potential adverse effects. Please produce a copy of any documents relating thereto.

83. Please describe any APE justification that was developed. Please produce a copy of any documents relating thereto.

84. Did the Applicant develop a technical study or analysis by a Qualified Professional addressing potential effects to historic sites and architectural resources that have not yet been evaluated, including any potential historic districts? If so, please describe and produce a copy of all written documentation.

85. In the Application materials, Applicant references a site visit discussing the Project with Scott Dillon, Survey Archaeologist from the

Vermont Division for Historic Preservation (VDHP). Did any other VDHP staff visit the project site to review and assess the potential for direct and indirect adverse effects to historic sites and/or resources in the Project APE during the pre-application consultation process or at any time? Please describe the site visit including how long it lasted, what properties were visited, what information was shared, and produce a copy of any field notes or documentation of such site visit.

86. Were any photographic simulations of Project build-out developed? Were any such simulations used to support analysis and consultation with VDHP regarding potential adverse visual effects, including any indirect adverse effects to historic structures? Please describe and produce a copy of any such simulations.

87. Did any site visit with VDHP include field inspection / field investigation in relation to the two Vermont State Register (VSR) historic sites adjacent to the Project Area, 30 Orchard Road (VSR 1111-16) and 300 West Street (VSR 1111-13)? If so, please describe and produce a copy of all written documentation of the field inspection/field investigation at these sites.

88. Was 290 West Street, fronting the intersection of Orchard Road and State Route 140, considered as a resource in the APE? If so, was the resource subject to evaluation under the criteria of the VSR or National Register of Historic Places (NRHP) in consultation with VDHP in order to determine if it was a historic site that may be affected by the Project? If so, how? Please produce a copy of any and all written documentation related thereto.

89. Have identified historic sites and resources in the Project APE been analyzed as contributors to a potential historic district or historic landscape, the bounds of which have yet to be determined? Please produce a copy of any and all written documentation related thereto.

90. Was the circa 1924 Apple Orchard in the Project Area evaluated for potential historic significance as a landscape resource? Please produce a copy of any and all written documentation related thereto.

91. Please provide copies of all correspondence between the Applicant and any Vermont State agency or department not previously submitted to the Board and parties in this proceeding.

92. Please produce copies of all environmental, wetlands, aesthetic, historic, or orderly development reports obtained by Applicant with respect to any property located in Middletown Springs, VT.

93. Produce all correspondence between Applicant and any other person or agency regarding siting of the solar array, whether at the current proposed site or at other alternative sites.

94. Please produce copies of all contractual agreements and correspondence between Applicant and Landowner.

95. Exactly what rights has the Applicant been granted, by the Landowners (the Querreys) that enable you to plant and maintain mitigation plantings on land outside of the proposed installation site?

96. How many acres in total have you leased or do you have an option to lease from the Querreys? Where is the leased land located? Please provide a copy of the lease and any map or other document evidencing such lease or option.

97. Please admit that no alternative sites were considered for the location of the proposed array. If denied, please provide the factual basis therefore. Please describe all efforts to review, investigate and consider any alternative sites and why they were not chosen for this project.

98. Is the currently proposed site more highly visible from route 140 and the Intervenor Neighbors' properties than it would be if it were sited on the alternative locations on this parcel or other property owned by Landowner which were pointed out during the site visit?

99. What is the lowest elevation of the ground level under the most northern row of the proposed array? What is the highest elevation of the ground level under the most southern row of the proposed array? How tall or high above the ground does any portion of the solar array equipment stand above the ground? What are the lengths of the fencing on the north, south east and west sides of the array? What are the total dimensions of the proposed solar array's coverage in terms of length, width and height of the overall installation?

100. What is the rate of the rise of land from the lowest section to the highest in the proposed Project Site?

101. How can a view from an elevation across the hollow that is higher in elevation than the proposed site, be mitigated with plantings that are placed at the front/northern most portion of the proposed site which is the lowest in elevation?

102. How can mitigation plantings on the western border of the proposed site screen the Fitzpatrick's' view of the proposed solar array without blocking their panoramic, vista views north and east of the farms and

mountains in and around Burnham Hollow and the Town of Middletown Springs itself?

103. Provide any and all photos, analysis or photo-simulations pertaining to this project in your possession and control which have not yet been filed with the PSB and the Intervenors. Please produce the two photo simulations you have promised to produce to the neighbors.

104. How many historic, above ground sites (houses, out buildings, barns, etc.) can be seen from anywhere on the proposed site? What are their addresses? Which have been assessed on your behalf by a qualified expert to determine if they will be adversely affected by the installation of the proposed solar array? Did your expert determine the adverse effect on one or more would be unduly adverse? If so, what is/are their address(s)?

105. What is the expected duration of the project? What is the "Project's useful life?"

106. Have there been any recommendations of the municipal and regional planning commissions? If so what are they and from whom? Have there been any recommendations of municipal legislative bodies? If so what are they and from whom?

107. How do the "form of the project, its scale and the potential continued use of remaining lands within the project parcel to retain agricultural function, all limit the impact the project will have on the orderly development of the region."

108. Please admit that the municipal plan seeks to preserve the scenic qualities of the Town by protecting scenic ridgelines. If denied, please provide the factual basis therefore.

109. Please admit that a goal of the municipal plan for the area proposed for the array is to "maintain attractive countryside with large tracts of open land in diversified agricultural uses." If denied, please provide the factual basis therefore.

110. Please admit that the Regional plan states: "No land development should be promoted where the effect of the proposed use unnecessarily impacts highly scenic landscapes, ecologically sensitive lands, or irreplaceable natural resources. To do so would be incompatible with land use policies contained in the Regional Plan."

111. How is the current project expected to not unnecessarily impact an identified "highly scenic landscape."

112. Describe each and every mitigation measure employed by the Applicant to address visual impacts of the project. What "context sensitive mitigation strategies to address potential visual impacts of the Project" has the Applicant developed and proposed for this project. Describe exactly what "SE Group has recommended a number of landscape mitigation measures" to be taken "to improve the harmony of the Project with respect to its surrounding and provide additional project screening.

113. Who is the "average person" for purposes of the Quechee analysis? Are any of the neighbors or intervenors "average persons" for purposes of the Quechee analysis? Why or why not? Are experts hired and paid to testify in favor of or in opposition to an application "average persons" for purposes of the Quechee analysis? Why or why not? Are any citizens of Middletown Springs "average persons" for purposes of the Quechee analysis? Why or why not? Are any of the 118 town residents that signed a petition to oppose the project "average persons" for purposes of the Quechee analysis? Why or why not?


114. Why was the limited liability company formed for this project named "Orchard Road Solar I"? Why is the Roman numeral "I" used? Is that an indication that there will be future Orchard Road Solar projects in the future?

115. Please identify the individual(s) who have participated or provided information in the preparation of these interrogatories and requests to produce.

YOU ARE HEREBY CALLED UPON TO SUPPLEMENT YOUR ANSWERS TO THESE INTERROGATORIES AS ADDITIONAL KNOWLEDGE OR INFORMATION SHALL, FROM TIME TO TIME, COME TO YOUR ATTENTION PERTAINING THERETO.

DATED at Barre, County of Washington and State of Vermont this 28th day of April, 2017.

Richard Spitalny, Robert & Karen Galloway,
Daniel McKeen & Ellen Secord, Neil & Thomas
Russell, Neighbors/Intervenors

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