

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Application of Peggy and David Howrigan for a certificate of public good pursuant to 30 V.S.A. §§8010 and 248 to install and operate a 100kW small wind generation system in Fairfield, Vermont to be known as "Howrigan Wind Farm"

Case No. 23-3729-NMP

**RESPONSES TO DISCOVERY REQUESTS SERVED UPON PEGGY HOWRIGAN AND DAVID HOWRIGAN
BY THE NORTHWEST REGIONAL PLANNING COMMISSION**

NOW COMES Petitioners Peggy and David Howrigan and hereby respond to the August 19, 2024 discovery requests by the Northwest Regional Planning Commission.

PROPOUNDING PARTY: NORTHWEST REGIONAL PLANNING COMMISSION

RESPONDING PARTIES: PEGGY AND DAVID HOWRIGAN

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Response to NRPC Discovery Request to Peggy and David Howrigan
October 4, 2024

1. Please describe how the petitioner selected the location on the project site for the proposed facility.

A. The turbines were sited to make the best energy with the lowest visual impact. The top of the Howrigan property is the only location where this can happen and is the only real estate available. There is limited space to fit 4 turbines. The turbine will not function in the valley or over the side of the hill.

Person answering: Jason Day
Title: Engineer/Owner, Star Wind Turbines LLC
Date: September 30, 2024

2. In determining the location of the facility, did the petitioner consider any other locations on the project site for the proposed facility?

A. Yes, placing the turbines over the side of the hill so they are not visible was considered, however this location reduces the energy greatly. The top of the Howrigan property is the only location where the energy is feasible. There is limited space to fit 4 turbines on top of the hill.

Person Answering: Jason Day
Date: September 30, 2024

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3. In determining the location of the facility, did the petitioner analyze whether an alternative placement on the project site could reduce the visual impact of the proposed facility?

A. Yes, moving the turbines out of sight down the back of the hill was considered. The loss of energy would be too great, however. The top of the Howrigan property is the only feasible location. There is limited space to fit 4 turbines. The turbines will not function well in the valley or over the side of the hill.

Person Answering: Jason Day
Date: September 30, 2024

I declare that the above Responses are true and accurate to the best of my knowledge and belief. I understand that if the above Responses are false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A §30.

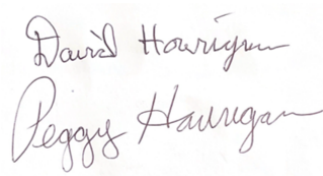
Dated at East Dorset, Vermont this 30th day of September, 2024.

A handwritten signature in black ink that reads "Jason A. Day". The signature is written in a cursive style with a long horizontal line extending to the left and another extending to the right.

Jason Day
President, Star Wind Turbines LLC

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Dated this 30th day of September, 2024

A rectangular box containing two handwritten signatures in cursive. The top signature reads "David Howrigan" and the bottom signature reads "Peggy Howrigan".

Peggy and David Howrigan
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