

From: McDougall, Robert
Sent: Friday, January 3, 2020 6:14 PM
To: Neal Cornett <ncornettlaw@gmail.com>
Subject: RE: Energy Policy Advocates Public Records Requests

Attorney Cornett: This e-mail is to confirm that we received your e-mail below wherein you narrow both Public Records Act requests made by Mr. Hardin. Thank you for your efforts to narrow both.

We will work to respond to your requests and I expect that we may have a response to the second request listed below near the end of next week.

The first request listed below, which you have narrowed to seek communications from parties outside of Vermont State Government, may take a little longer because even as narrowed the responsive records (some of which may ultimately be exempt from production) will still include communications relating to the State of Vermont's two PFAS litigation cases against DuPont and 3M (e.g, communications with outside counsel representing the State, communications from the Court and filings by other parties). Accordingly, this may still require review of significant documents and records.

Thank you,

Rob McDougall
Assistant Attorney General

From: Neal Cornett <ncornettlaw@gmail.com>
Sent: Friday, December 27, 2019 11:16 AM
To: McDougall, Robert <robert.mcdougall@vermont.gov>
Subject: Energy Policy Advocates Public Records Requests

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Mr. McDougall:

I am writing on behalf of my client Energy Policy Advocates. In both your December 23, 2019 letter responding to EPA's December 8, 2019 request and your October 15, 2019 letter responding to EPA's October 14, 2019 request to Mr. Hardin, you requested EPA narrow its requests.

EPA would like to narrow both requests. Regarding the first request which sought:

all correspondence, and any accompanying information, including also any attachments, that a) was sent to or from or copies (whether as cc: or bcc:) Robert McDougall, that b) also includes, anywhere, the following search terms i) PFOS, ii) PFAS, and/or iii) PFOA and which is c) dated from March 27, 2019 through the date you process this request, inclusive.-

EPA would now like to narrow the request to the following:

all correspondence, and any accompanying information, including also any attachments, that a) was sent to or from or copies (whether as cc: or bcc:) Robert McDougall, that b) also includes, anywhere, the following search terms i) PFOS, ii) PFAS, and/or iii) PFOA, that c) was sent to or from or copies any party outside of the vermont.gov domain, and which is d) dated from March 27, 2019 through the date you process this request, inclusive.

As for the December 8, 2019 request which sought:

all correspondence, and any accompanying information (see discussion of SEC Data Delivery Standards, *infra*), including also any attachments, a) sent to or from or copying (whether as cc: or bcc:) Scot Kline and/or Nick Persampieri, that b) includes Pawa, including but not limited to mp@pawalaw.com, anywhere, whether as sent to or from or copying (again whether as cc: or bcc:), or otherwise, including in any attachments, and c) is dated from January 1, 2016 through December 31, 2016, inclusive.

EPA would like to narrow the request to the following:

all correspondence, and any accompanying information (see discussion of SEC Data Delivery Standards, *infra*), including also any attachments, a) sent to or from or copying (whether as cc: or bcc:) Scot Kline and/or Nick Persampieri, that b) includes the word Pawa, anywhere, including but not limited to in mp@pawalaw.com, AND any of the following words i) powerpoint, ii) slides, and/or iii) Dropbox, anywhere, including in any attachments, and c) is dated from January 1, 2016 through December 31, 2016, inclusive.

Thank you for all of your assistance with these requests and please let me know if you need any additional clarification.

Sincerely,
Neal Cornett
Attorney at Law

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