

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 23-3604-PET

Petition of Vermont Public Power Supply Authority for approval of a proposed EV/EVSE tariff rider program for its member utilities	
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FIRST SET OF INFORMATION REQUESTS
SERVED UPON VERMONT PUBLIC POWER SUPPLY AUTHORITY
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Erin C. Brennan, hereby serves this First Set of Information Requests upon Vermont Public Power Supply Authority (“Petitioner” or “VPPSA”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that the Petitioner answer the requests herein, conforming to Commission Rule 2.230, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier no later than January 31, 2024. Please provide Petitioner’s answers in electronic format (i.e. word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format.

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as Petitioner is able to provide an answer or production. In other words, Petitioner should not withhold a response to any requests for which it has responsive data, documents, etc. until Petitioner is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires that the response to each request is to be made under oath by a person competent to testify concerning the response, as well as all documents and exhibits produced as part of said response. When responding to each request please state: (1) the name(s) and title(s) of the person(s) responsible for preparing the response;

(2) the administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question, or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). Petitioner must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to Petitioner. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of petitioner's filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

DEFINITIONS

8. "Identify," when used in reference to natural person(s) or legal entities shall be interpreted to request the full name and current business address of said person(s) or entities.

9. "Petitioner," as used herein, shall refer to the Petitioner.

10. "Document," as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. "Document" shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

11. "Petition" shall mean the Petitioner's Petition and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

12. "FY" shall mean Fiscal Year.

13. With respect to each document produced by Petitioner, please identify the person who prepared the document and the date on which it was prepared.

14. If any interrogatory or request necessitates a response that Petitioner believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

15. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

16. To expedite the discovery process and the resolution of this case, if Petitioner wishes clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

17. The Department reserves the right to submit additional information requests to Petitioner.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.VPPSA.1-1. Does VPPSA expect to use any "guardrails" on day-ahead pricing (i.e. minimum or maximum prices expressed in cents per kWh)?

Q.DPS.VPPSA.1-2. Does VPPSA expect any direct customer involvement on a daily basis? (In other words, customer decision making rather than a third-party service or platform provider.)

Q.DPS.VPPSA.1-3. Will VPPSA allow customers to participate in the EV rate without using a third-party service platform or provider?

Q.DPS.VPPSA.1-4. Please explain what Mr. Farman meant when, in the January 11, 2024 workshop, he described resetting rates on an annual basis.

Q.DPS.VPPSA.1-5. How would the PowerShift pilot function once an EV rate is offered by VPPSA's member utilities?

Q.DPS.VPPSA.1-6. Will the EV rate be the same in each VPPSA member territory?

Q.DPS.VPPSA.1-7. How will an EV rate serve major users, such as the transit bus depot located in the Lyndon Electric Department territory?

Q.DPS.VPPSA.1-8. Does VPPSA or its members expect to offer special contracts for major EV charging customers in lieu of participation in the EV rate?

Q.DPS.VPPSA.1-9. Certain member territories have a significant share of winter or summer vacation homes, such as Ludlow, Hardwick, and Barton territories. Will the EV rate be available to those customers?

Q.DPS.VPPSA.1-10. To assist in understanding the technology and customer experience, please provide a few examples of possible service or platform providers (e.g., a customer's OpenADR-Compliant Authorized Representative).

Q.DPS.VPPSA.1-11. Please provide a sample bill showing the line items for the proposed EV. If one is not available, please identify when a sample bill will be available for at least one member territory.

Q.DPS.VPPSA.1-12. Please describe how VPPSA's power supply portfolio, including contract length and hedging activities, will or will not affect the EV rate over the next three to five years.

Located at Montpelier, Vermont this 16th day of January 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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