

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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**SECOND 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 Second 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 February 21, 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. "EV" shall mean Electric Vehicle.

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

15. 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.

16. 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.

17. 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.

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

**INTERROGATORIES AND REQUESTS TO PRODUCE**

**Q.DPS.VPPSA.2-1.** How will VPPSA educate customers on understanding the EV rate opportunity and actions to take to enroll and utilize the rate?

**Q.DPS.VPPSA.2-2.** Will VPPSA or its contractor(s) provide a phone number and website to answer questions from prospective enrollees?

**Q.DPS.VPPSA.2-3.** What tools or analyses will VPPSA or its contractor(s) provide to prospective enrollees that will allow customers to estimate their financial savings?

**Q.DPS.VPPSA.2-4.** Will there be training opportunities for customers when or before signing up for the rate? If so, please describe.

**Q.DPS.VPPSA.2-5.** Will there be a disclosure for all costs and fees to use the rate service?

**Q.DPS.VPPSA.2-6.** What additional fees may be incurred beyond contemplated in the tariff (i.e., customer fees for access to a platform, vehicle enrollment or subscriptions for telematics, etc.)?

**Q.DPS.VPPSA.2-7.** How has VPPSA reviewed and analyzed the experience in other states regarding what kinds of cost and fee disclosures are provided in those states? Please provide examples.

**Q.DPS.VPPSA.2-8.** Has VPPSA prepared a process for receiving and acting on customer complaints? If so, please describe.

**Q.DPS.VPPSA.2-9.** What is the customer process to end participation in the EV rate? Has VPPSA prepared the process for disenrolling customers, either at their request or for other reasons? If so, please describe.

**Q.DPS.VPPSA.2-10.** Does VPPSA expect that member utilities' staff will receive or address consumer questions or complaints?

**Q.DPS.VPPSA.2-11.** Who at VPPSA will serve as the contact for the Department when complaints are raised to the Department or Commission?

**Q.DPS.VPPSA.2-12.** How will VPPSA analyze and report on participant feedback and ratepayer impacts broadly?

**Q.DPS.VPPSA.2-13.** Will VPPSA implement an annual customer satisfaction survey of all participating customers?

**Q.DPS.VPPSA.2-14.** What performance metrics will indicate success for the project? What are the performance indicators? Please describe.

**Q.DPS.VPPSA.2-15.** What has VPPSA learned from other states on such indicators?

**Q.DPS.VPPSA.2-16.** (a) Does VPPSA have enrollment targets? (b) If so, what are they? (c) How will VPPSA sustain or grow enrollment and participation in proportion with the number of EVs in each member territory?

**Q.DPS.VPPSA.2-17.** Does VPPSA believe the tariff can be made fully available to all member utility territories by June 30, 2024?

**Q.DPS.VPPSA.2-18.** What reports or analyses did VPPSA review before or during the preparation of the proposed tariff? Please provide the reports/analyses.

**Q.DPS.VPPSA.2-19.** (a) How will billing information be transmitted from the VPPSA-selected platform provider to each member utility's billing system? (b) Will customer bill adjustments be automated?

**Q.DPS.VPPSA.2-20.** How will VPPSA and its member utilities address cybersecurity requirements and best practices regarding customer usage and billing information? In the response, please include non-technical elements (such as non-disclosure agreements).

**Q.DPS.VPPSA.2-21.** Informed consent requires appropriate consumer education. (a) Will customers be provided with information about which account details will be provided to the third-party contractor or vendor? (b) How and when will that occur? (c) How will the third-party provider be compensated?

**Q.DPS.VPPSA.2-22.** How many entities will have possession of the customers' data, and for what purposes? Please individually list the type of provider and purpose.

**Q.DPS.VPPSA.2-23.** How does VPPSA expect to review or vet customer-selected, third-party providers, both in terms of technical suitability as well as financial reliability (e.g., counterparty risk in the start-up technology space).

Located at Montpelier, Vermont this 7<sup>th</sup> day of February 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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