

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 19-1270-TF

Washington Electric Cooperative tariff filing for rate design changes and a change in rate schedules to be effective on services rendered beginning June 17, 2019	
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**DEPARTMENT OF PUBLIC SERVICE’S FIRST SET OF DISCOVERY REQUESTS ON
THE WASHINGTON ELECTRIC COOPERATIVE, INC.**

The Department of Public Service (the “Department” or “PSD”) by: Daniel Burke, Special Counsel, hereby serves the following First Set of Discovery Requests upon the Washington Electric Cooperative, Inc. (“WEC” or the “Company”) in this matter in accordance with Public Utility Commission 2.214 and V.R.C.P. 33 and 34, and requests that WEC answer the requests in accordance with V.R.C.P. 33 and 34 and deliver answers and all requested documents and materials to the Department no later than **Monday, August 19**. WEC is requested to provide its responses and documents production in electronic format, that is, Word or other format readable by the Department. Paper and or/printed copies of the responses and any documents produced are not necessary. WEC is encouraged to contact the Department, through undersigned counsel, as soon as possible with any questions regarding any discovery requests included herein.

INSTRUCTIONS AND DEFINITIONS

1. Responses to any and all Department requests that are contained herein or that may be filed later should be supplied to the Department as soon as they become available to WEC. That is, WEC should not hold answers to any requests for which they have responsive data, documents, etc. until responses to any or all other requests are compiled.
2. V.R.C.P. 33 requires the response to each request to be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.

3. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in WEC's workpapers and files or that is otherwise available.
4. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). WEC is directed to change, supplement and correct answers to conform to all information as it becomes available to WEC, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.
5. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
6. Some of the Department's requests may make particular reference to a portion of WEC's proposed tariff schedules, prefiled testimony, or other filings. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to WEC that is responsive to the questions stated.
7. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.
8. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. **All spreadsheets provided must be in native format and have all formulae and links intact and accessible.**
9. "Petition," as used herein, shall refer to the petition and associated attachments that WEC filed with the Commission on May 1, 2019, unless the context indicates otherwise.
10. "WEC," as used herein, shall refer to Washington Electric Cooperative, Inc.
11. "Department," or "PSD," as used herein, shall mean the Vermont Department of Public Service.
12. "Commission," as used herein, shall mean the Vermont Public Utility Commission.

13. With respect to each document produced by WEC, identify the person who prepared the document and the date on which the document was prepared.
14. 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 it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject-matter of the document as well as the complete legal and factual basis for the objection.
15. To expedite the discovery process and the resolution of this docket, WEC should contact the Department as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.
16. The Department reserves the right to submit additional information requests to WEC to the extent permitted by the Vermont Rules of Civil Procedure and any scheduling orders adopted by the Commission in this proceeding.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.PSD.WEC.1.1 Please provide electronic copies of all exhibits filed by WEC in support of its proposed rate design adjustments in native file format (i.e. Microsoft Excel) with all cells and formulae intact.

Q.PSD.WEC.1.2 Please describe in detail WEC's rationale for not proposing any changes to the rate class revenues collected from its customers based on the results of the cost-of-service study.

Q.PSD.WEC.1.3 Please describe in detail WEC's rationale for not proposing any changes to its tariff components to be consistent with the results of its cost-of-service study.

Q.PSD.WEC.1.4 Please refer to Exhibit WEC 10-JAS-1, which includes allocation factors listed in the column headed "Control." Please provide the values of each allocation factor and the qualitative data used to determine the allocator value.

Q.PSD.WEC.1.5 Please refer to Exhibit WEC 11-JAS-2. Please explain why "Total Production Plant" is allocated only to demand and not energy.

Q.PSD.WEC.1.6 Please refer to Page 17 of Strong's direct testimony, where he refers to a "minimum system method" used to allocate the cost of the Distribution Plant. For each account associated with Distribution Plant, please provide the quantitative analysis used to determine these amounts.

Q.PSD.WEC.1.7 Excluding the cost of service calculations, please state whether WEC's Board of Directors relied on any quantitative data sources other than the qualitative focus group's responses for making its decision regarding the level to set the increased customer charge. If yes, please provide copies of any such data relied upon by WEC that has not previously been provided to the Department.

Q.PSD.WEC.1.8 Please describe in detail WEC's rationale for not using a phased in approach for adjusting the customer charge. Please also provide copies of any data relied upon by WEC to make this determination.

Q.PSD.WEC.1.9 Please state whether WEC evaluated a reduced customer charge for low-income customers in connection with its proposed rate design adjustment. If yes, please describe the reasons for not proposing a reduced customer charge for low-income customers.

Q.PSD.WEC.1.10 Please refer to page 23, line 6 of Ms. Richards' direct testimony. Please state whether the phrase "least able" is meant to mean "low income." If yes, please state whether WEC has any data to support the statement that the write-offs (uncollected payments) are caused by those "least able" to pay their bill. Please also respond to the following:

- a. Please state whether write-offs are subsequently recovered via collections or sale

of the debt;

b. Please also provide the amount of write-offs by rate class.

Q.PSD.WEC.1.11 Please refer to page 23, line 19 of Ms. Richards' direct testimony. Please describe in detail the basis for Ms. Richards' statement that "we believe the stratification of use for low income in other utility service territories is similar to that of WEC membership."

Q.PSD.WEC.1.12 Please state how WEC was able to determine that some participants in its focus group meetings are low-income.

Q.PSD.WEC.1.13 Please refer to page 22, line 14 of Ms. Richards' direct testimony. If known to WEC, please state that percentage of the "roughly 22% of WEC members that use between 0 and 250 kWh per month" that participate in the net-metering program or otherwise self-generate electricity.

Q.PSD.WEC.1.14 Please state the total number of WEC members that participate in the net-metering program.

Q.PSD.WEC.1.15 Please state the rationale for including small farms within WEC's residential rate.

Q.PSD.WEC.1.16 Please provide copies of mocked-up WEC bills for a residential rate payer using 400 kWh, 500 kWh, 600 kWh and 700 kWh at both the current rates and the WEC's proposed adjusted rates.

By: /s/ Daniel C. Burke
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