

Q.VGS.INTERVENORS.1-11: Please refer to Page 12 of Dr. Grubert's Direct Testimony discussing a future that complies with the Global Warming Solutions Act.

- a. Has Dr. Grubert modelled how Vermont could achieve the goals set forth in the Global Warming Solutions Act?
- b. If so, please produce all calculations, analysis, workpapers, and documents relating to Dr. Grubert's modelling, including all related economic impacts on Vermont customers and businesses.
- c. Please produce all calculations, analysis, workpapers, and documents supporting Dr. Grubert's claims that the GWSA goals can be achieved through "electrification and further efficiency upgrades" and describe in the detail the related economic impacts on Vermont customers and businesses.

A.VGS.INTERVENORS.1-11:

- a. I object to this interrogatory as irrelevant to whether the present contract produces GHG reductions commensurate with the legislated mandates of the Global Warming Solutions Act. I have not modelled compliance pathways for Vermont.
- b. See A.VGS.INTERVENORS.1-11a.
- c. I object to this interrogatory as irrelevant to whether the present contract produces GHG reductions commensurate with the legislated mandates of the Global Warming Solutions Act, which do not include adjustments based on economic impacts.

Respondent: Dr. Emily Grubert
Title: Witness for Catherine Bock
Date: Sept. 13, 2022