

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 22-3947-TF

Tariff filing of City of Burlington Electric Department to revise its net- metering tariff effective October 1, 2022	
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**VERMONT DEPARTMENT OF PUBLIC SERVICE INFORMATION REQUESTS FOR
THE CITY OF BURLINGTON ELECTRIC DEPARTMENT**

The Vermont Department of Public Service (the “Department” or “DPS”) hereby serves this First Set of Information Requests upon the City of Burlington Electric Department (“BED” or “Petitioner”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214 and V.R.C.P. 33 and 34, in the above referenced matter. The Department requests that BED answer the requests herein, conforming to V.R.C.P. 33 and 34, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier no later than February 10, 2023. Please provide the Petitioner’s answers in an 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 V.R.C.P. 33.
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as BED is able to provide an answer or production. In other words, BED should not withhold a response to any requests for which it has responsive data,

documents, etc. until BED is able fully answer all pending requests when a reply is forthcoming for some questions.

3. V.R.C.P. 33 mandates 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 V.R.C.P. 26(e). BED must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to BED. 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 BED's filings. Notwithstanding the specific citation, all such requests should be understood to seek all information that is responsive to the question.

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. "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.
10. "Petition" shall mean BED's tariff and all associated attachments or documents, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.
11. For each document produced by BED, please identify the person who prepared the document and the date on which it was prepared.
12. If any interrogatory or request necessitates a response that the Petitioner believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in V.R.C.P. 26(b)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.
13. 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 that it is not objected to. 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.

14. To expedite the information request process and the resolution of this case, if the 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.
15. The Department reserves the right to submit additional information requests to BED.

INTERROGATORIES AND REQUESTS TO PRODUCE

- Q.DPS.BED – 1-1:** Please cite the section(s) of BED's tariff that implements 30 V.S.A. § 219a(e) and explain.
- Q.DPS.BED – 1-2:** Please cite the section(s) of BED's tariff that implements 30 V.S.A. § 219a(f) and explain.
- Q.DPS.BED – 1-3:** Please cite the section(s) of BED's tariff that implements 30 V.S.A. § 219a(h)(1)(K) and explain.
- Q.DPS.BED – 1-4:** Please cite and describe the basis and history of any section(s) of BED's tariff which it maintains corresponds to § 219a(h)(1)(J).
- Q.DPS.BED – 15:** Please describe which of the sections above is subject to the rollover and cash payment provisions of BED's net-metering tariff.
- Q.DPS.BED – 1-6:** To the extent that BED maintains that one or more sections of BED's tariff corresponds to one or more of the above captioned statutes, please identify which, and describe the basis and history of that applicability.
- Q.DPS.BED – 1-7:** Please cite and describe the basis and history of any section(s) of BED's tariff that corresponds to 30 V.S.A. § 219a(h)(1)(J).

Q.DPS.BED – 1-8: Please provide example of a customer bill, or bills, which is either generic or which has any personal identifying information redacted, of personal indicating the amount and type of credit being rolled over beyond 12 months or cashed out.

Q.DPS.BED – 1-9: Please cite the language in 30 V.S.A. § 219a and/or Rule 5.100 that authorizes rollover of net-metering credits beyond 12 months or cashing out of those credits.

Q.DPS.BED – 1-10: Please cite any other authorization BED has obtained to roll over net-metering credits beyond 12 months and/or cash out those credits and describe how it is compatible with 30 V.S.A. §§ 219a(e)(3)(C), and/or § 219a(h)(1)(K)(ii), and/or Rule 5.100.

Q.DPS.BED – 1-11: Please provide a summary of the total number of customers who have received cash payments of credits and the amount that has been paid to those customers.

Q.DPS.BED – 1-12: Please provide an estimate of the remaining amount BED anticipates paying out under this provision and why.

Dated in Montpelier, Vermont on this 17th day of January 2023.

Sincerely,

/s/ Alex Wing

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cc: ePUC Service List