

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-0729-TF

Tariff filing of Town of Hardwick Electric Department requesting an overall rate increase of 13.24% effective with service rendered on or after June 1, 2025	
--------------------------------------------------------------------------------------------------------------------------------------------------------------	--

**FIRST SET OF INFORMATION REQUESTS
SERVED UPON THE TOWN OF HARDWICK ELECTRIC DEPARTMENT
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Alexander Wing, hereby serves this First Set of Information Requests upon the Town of Hardwick Electric Department (“Hardwick” or “HED”) and the Vermont Public Power Supply Authority (“VPPSA”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that Hardwick and VPPSA 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 **Thursday, July 31, 2025**. Please provide Hardwick’s and VPPSA’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 Hardwick and/or VPPSA are able to provide an answer or production. In other words, HED and VPPSA should not withhold a response to any requests for which it has responsive data, documents, etc. until Hardwick or VPPSA are 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 specified 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). Hardwick and VPPSA must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to Hardwick or VPPSA. 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 HED's filings. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

8. With respect to each document produced by Hardwick or VPPSA, please identify the person who prepared the document and the date on which it was prepared.

9. If any interrogatory or request necessitates a response that Hardwick or VPPSA 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.

10. 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.

11. To expedite the discovery process and the resolution of this case, if Hardwick or VPPSA 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.

12. The Department reserves the right to submit additional information requests to Hardwick or VPPSA.

DEFINITIONS

13. “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.

14. “Hardwick” and “HED” means the Town of Hardwick Electric Department.

15. “VPPSA” means the Vermont Public Power Supply Authority.

16. “Department” and “DPS” mean the Vermont Department of Public Service.

17. “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.

18. “Petition,” as used herein, means the Town of Hardwick Electric Department’s Petition requesting an overall rate increase and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

19. “FY,” as used herein, means Fiscal Year.

20. “Department,” as used herein, means the Vermont Department of Public Service.

21. “Commission,” as used herein, means the Vermont Public Utility Commission.

22. “VELCO” means Vermont Electric Power Company, Inc. and Vermont Transco, LLC.

23. “O&M” means Operations and Maintenance.

24. “CEP” means the 2022 Vermont Comprehensive Energy Plan and Vermont Electrical Energy Plan prepared by the Vermont Department of Public Service pursuant to 30 V.S.A. §§ 202 and 202b.

25. “COS” means cost of service.

26. “RES” means the Vermont Renewable Energy Standard as established or used under 30 V.S.A. §§ 8001-8016 or Commission Rule 4.400.
27. “REC” means renewable energy credit.
28. “AMI” means Advanced Metering Infrastructure.

INTERROGATORIES AND REQUESTS TO PRODUCE

General Financial Information

Q.DPS.HED:1-1. Please provide HED’s audited financial statements for the fiscal year ending December 31, 2024.

Q.DPS.HED:1-2. Is HED aware of any non-recurring items in its proposed cost-of-service? If so, please provide them with a description.

Q.DPS.HED:1-3. Please provide the annual expense totals for the past 5 years (2020-2024) for each of the accounts in:

- a. Customer & Sales (901-919);
- b. Admin & General (920-935); and
- c. Distribution (580-598).

Q.DPS.HED:1-4. Please refer to Exhibit HED-Farman-15.

- a. How were the test year net-metering kWh values determined for the purpose of this exhibit? Please explain.
- b. What is HED’s current billing methodology for individual net-metering customers whose systems are located behind the customer’s billing meter and are not part of group net-metering systems? In your response, please:
 - i. Identify how HED measures kWh consumption and generation for these customers, including a description of the metering configuration in use;
 - ii. Describe how the measured kWh values are used to determine billing determinants, specifically addressing whether kWh values are netted over the billing period prior to the application of monetary rates;
 - iii. Explain the rates applied to imported and exported energy, and whether HED calculates net monetary value before or after performing kWh netting;
 - iv. Provide the number of customers subject to this billing methodology during both the test year and the rate year;

- v. Describe how HED's billing practice aligns with Commission Rule 5.126(A)(2), and identify any deviations from the rule's requirement that netting of electricity (kWh) must occur before monetization; and,
- vi. Confirm whether the revenue and load adjustments reflected in Exhibit HED-Farman-15 are based on the same billing methodology described above, and explain all assumptions used in those calculations, including treatment of kWh netting and monetization.

Payroll

- Q.DPS.HED:1-5.** Please refer to Steven Farman, VPPSA on behalf of HED ("Farman") pf. at 6.
- a. Please provide a copy of the newly ratified labor agreement effective on June 1, 2025.
 - b. Please specify and describe where the agreement provides for the approved 5% wage increase effective June 1, 2025.

Customer Affairs

- Q.DPS.HED:1-6.** Please provide copies of both the current residential and commercial bills.
- Q.DPS.HED:1-7.** Please provide a copy of a prospective bill for a residential customer and a commercial customer, both implementing the rate increase.

Power Supply

- Q.DPS.HED:1-8.** Please refer to Exhibits HED-HD-1 and HED-HD-2.
- a. How have Forward Energy Market Prices changed since Hardwick filed in April?
 - b. Please quantify how using more recent price assumptions would impact: Rate Year Energy Market Costs in cell H31 of Exhibit HED-HD-1, Rate Year Energy Credits in cell I28 of Exhibit HED-HD-1, and summarize the net impact to Hardwick's rate year power supply costs.
- Q.DPS.HED:1-9.** Please provide a status update on Hardwick's Wolcott Hydro resource and confirm that it is still not expected to be operational during the rate year as noted in the testimony, Heather D'Arcy, VPPSA on behalf of HED ("D'Arcy") pf. at 8.
- Q.DPS.HED:1-10.** Does Hardwick utilize all Tier II RECs produced from its Billings Road Solar project in the rate year to fulfill their proportional share of VPPSA's RES compliance obligations?
- a. If not, what happens to any RECs in excess of Hardwick's proportional share of VPPSA Tier II compliance obligations and how does this directly benefit Hardwick?
- Q.DPS.HED:1-11.** Please identify any changes in REC market eligibility for the McNeil and Ryegate biomass facilities that have occurred since Hardwick filed this rate case. Please quantify

any impacts these changes in eligibility will have on rate year REC revenues as depicted in Exhibit HED-HD-9.

Dated at Montpelier, Vermont, this 10th day of July 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ Alex Wing
Alexander Wing, Special Counsel
112 State Street
Montpelier, VT 05620
(802) 461-5009
alexander.wing@vermont.gov

cc: ePUC Service List