

**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	
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**SECOND 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 Second 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 answers and all requested documents and materials to the Department’s offices in Montpelier no later than **Thursday, October 2, 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

Q.DPS.HED:2-1. Hardwick has made investments in Wolcott Hydroelectric for flood related repairs that damaged the facility in 2023 and 2024. *See generally* Exhibit HED-Farman-11b, 2025 Depreciation Report.

- a. How, if at all, are these repair costs represented in Hardwick's test or rate year? Please explain.
- b. Has Hardwick applied for Federal Emergency Management Agency (“FEMA”) reimbursement of these costs, and if so, how much has Hardwick applied for? If Hardwick has received reimbursement, please quantify and describe.

Q.DPS.HED:2-2. Please refer to the first-round discovery response Attachment HED.1-3, O&M. Please explain the large increase in Account 593 expenses in the test year 2024 vs. previous years.

Q.DPS.HED:2-3. Please provide HED’s audited financial statements for the fiscal year ending December 31, 2024. If unavailable, please provide:

- a. a status update on the audit,
- b. any known areas of dispute that may have an impact on the proposed cost-of-service,
- c. when the audited results may become available, and
- d. the audit, when available.

Q.DPS.HED:2-4. Please refer to the first-round discovery response Attachment HED.1-5, Union Contract. Please admit or deny that the wage increases from June 1, 2024, to June 1, 2025, are closer to 3.8% versus the 5.0% assumed in EXHIBIT HED-FARMAN-10A and explain basis for the admission or denial.

Q.DPS.HED:2-5. Please refer to Exhibit HED-Farman-16, the HED net-metering adjustment, including at lines 15, 22, 30, and 38, which show net-metering and miscellaneous adjustments by rate class. For individual net-metering customers whose systems are located behind the billing meter and are not part of a group system, please:

- a. Describe HED's metering configuration for these customers, specifically indicating how kWh consumption and generation are separately or jointly measured.
- b. Explain in detail how these measured kWh values are used to calculate billing determinants. Specifically, confirm whether kWh consumption and generation are netted over the billing period before application of monetary rates, and explain how HED's netting practices are aligned with Commission Rule 5.126(A)(2).
- c. State the rates applied to imported and exported energy for these customers and identify whether HED calculates a net monetary value using monetary credits before or after applying kWh netting.
- d. Confirm whether the revenue adjustments for net-metering shown in Exhibit HED-Farman-16 (lines 15, 22, 30, 38) reflect the same billing methodology described above, or if a different assumption is used in the COS model. If a different method is used, please explain all underlying assumptions and provide a reconciliation between the billing practice and the COS adjustment.
- e. Provide the number of customers subject to this billing methodology during both the test year and the rate year.

Dated at Montpelier, Vermont, this 11th day of September 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc: ePUC Service List