

**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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**PETITIONERS' RESPONSES TO DEPARTMENT'S
THIRD SET OF INFORMATION REQUESTS**

The Town of Hardwick Electric Department (“HED” or “Petitioner”), in accordance with V.R.C.P. 33 & 34 and Rules 2.214 and 2.230 of the Vermont Public Utility Commission (“Commission” or “PUC”), hereby submits the following Responses to the Third Set Information Requests propounded to the Petitioner by the Vermont Department of Public Service (the “Department”) on January 15, 2026.

General Objections

1. To the extent that the Petitioner responds to the Department’s Discovery Requests, the Petitioner does not concede the relevancy of the responses or documents to the present action, nor does it concede that such responses or documents may be used for any purpose in this or any other action, lawsuit or proceeding. The Petitioner expressly reserves its right to object to further discovery into the subject matter of any of the responses or any portion thereof.

2. The Petitioner objects to the Discovery Requests to the extent that they seek information and/or documents equally available to the requester or that are not within the possession, custody or control of the Petitioner.

3. The Petitioner objects to these Discovery Requests (including their instructions and definitions) to the extent that they purport to impose obligations beyond the applicable law, PUC rules and decisional law.

4. The Petitioner objects to any request to produce data other than in the form in which the Petitioner stores or maintains data in the ordinary course of business.

5. The Petitioner objects to any definition or instruction that provides for a definition of any term at variance with its common and ordinary meaning. In responding to these Discovery Requests, the Petitioner shall apply the common meanings of any and all such terms.

6. The Petitioner objects to Discovery Requests that seek all documents concerning a particular subject as overbroad and unduly burdensome in that the Petitioner can and will only produce such documents reasonably relating to a particular subject within the Petitioner's custody, possession and control.

7. The Petitioner objects to the extent that the instructions and/or definitions seek to impose burdens on the Petitioner that are greater than those imposed by applicable provisions of V.R.C.P. 26, 33 or 34 and PUC Rules 2.214 and 2.230, impose undue burdens on the Petitioner, and/or have the effect of making the Discovery Requests overbroad. The Petitioner will make a good faith effort to provide information responsive to the Discovery Requests subject to this objection, but it specifically objects to providing, among other things, drafts of documents, identical copies of documents, non-identical copies of documents that contain handwritten notes, and descriptions of responsive documents that may have once existed but cannot now be produced due to loss or destruction.

8. The Petitioner reserves the right to object that any Discovery Requests, individually or in the aggregate, are overly burdensome and exceed reasonable limits of discovery or are not reasonably calculated to lead to the discovery of admissible evidence.

9. The Petitioner objects to any Discovery Requests for which the response requires disclosure, response or production of confidential information of the Petitioner or which is subject to the attorney-client privilege. The Petitioner objects to any Discovery Requests for which the response requires the disclosure of information or documents from a third party of a confidential or proprietary nature which the Petitioner is not authorized to disclose.

Specific Objections

Any specific objections to information requests are incorporated within the responses attached hereto.

Responses

Q. DPS.HED.3.1 Please refer to Steven Farman, VPPSA ("Farman") pf. reb. at 4-5 and Exhibit HED-Farman-Reb-1. Please provide the year to date actuals for Account 923, including but not limited to 923.02 (ADMIN & GEN-OUT SER ENG), 923.04 (ADMIN & GEN-O SER), and 923.06 (ADMIN & GEN-OUT SER OTH).

A. DPS.HED.3.1 Please refer to Attachment DPS.HED.3.1.

Person responsible for preparing response:

Date:

Steven Farman, Mgr. of Planning & Support

February 5, 2026

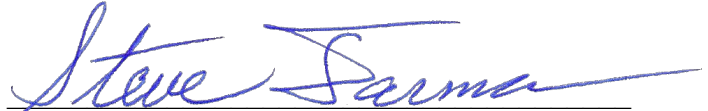
Person competent to give testimony:

Steven Farman

Attestation

As to Answers DPS.HED. 3.1:

In accordance with Rule 2.230(M) of the Vermont Public Utility Commission, I declare that the above Answers are true and accurate to the best of my knowledge and belief.




Steven Farman

Manager of Planning & Support, VPPSA

Certification

As to all objections:



Elijah D. Emerson, Esq.
Primmer Piper Eggleston & Cramer PC
Counsel for the Petitioners

DATED at Burlington, Vermont, this 5th day of February, 2026.

Respectfully submitted,

TOWN OF HARDWICK ELECTRIC
DEPARTMENT

By: PRIMMER PIPER EGGLESTON & CRAMER PC,
Their Attorneys

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