

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 22-4100-TF

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Tariff filing of Washington Electric Cooperative, Inc. for a 14.19% rate increase effective with service-rendered November 1, 2022

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**WEC's Response to Commission Request for Information**

On January 6, 2023, the Commission issued information requests and directed Washington Electric Cooperative, Inc. (WEC) to respond to the requests by January 19, 2023. The deadline for responses was extended to January 23, 2023.

The Commission also directed that the responses to its questions shall be filed as supplemental testimony and filed in ePUC. Supplemental testimony is being filed along with these responses. The responses below specify what testimony is responsive to each request.

1. On December 6, 2022, the Vermont Department of Public Service ("Department") filed its first round of discovery questions for WEC. In addition to filing its responses in ePUC, WEC is directed to file documents responsive to the following questions: Q.PSD.WEC.1-1, 1-2, 1-4, 1-5, 1-6, 1-20, and 1-23.

RESPONSE: All responsive documents were filed in native format in ePUC on January 12, 2023. (Please note that documents responsive to Q.PSD.WEC. 1-1 were served on the Department in native format on December 30, 2022.)

2. Referring to Q.PSD.WEC.1-4, in addition to the response to the Department's question, please provide an analysis of rate impacts at Time Interest Earned Ratios ("TIER") of 1.25, 1.5, 1.75, and 2.0.

RESPONSE: Please see Teia Greenslit's supplemental testimony and exhibits attached to Ms. Greenslit's testimony.

3. Q.PSD.WEC.1-5 requests cash-flow modeling in Excel format. Please also provide an historical analysis of cash-on-hand for the past 10 years. In addition, please explain whether WEC has experienced cash-flow problems in the past including an explanation of the circumstances leading to any such problems.

RESPONSE: Please see Teia Greenslit's supplemental testimony and exhibits attached to Ms. Greenslit's testimony.

4. Q.PSD.WEC.1-14 refers to "the current Construction Work Plan." Please file this document and any related documents with the Commission.

RESPONSE: WEC's current Construction Work Plan is attached to this response as Exhibit PUC 4A. The current CWP may also be found as Exhibit 1 to WEC's Petition to Approve WEC's Promissory Note to the Rural Utilities Service to Finance its Construction Work Plan (May 22, 2019), Case No. 19-1980-PET. The Commission approved that petition. Order Consenting to Indebtedness and Mortgage & Security Agreement (08/14/2019), Case No. 19-1980-PET, attached to this response as Exhibit PUC 4B.

Documents related to the current Construction Work Plan are numerous and voluminous. Several other related documents may be found on ePUC in Case No. 19-1980-PET, including the Rural Utilities Service's approvals of WEC's Construction Work Plan, attached to this response as Exhibits PUC 4C and 4D. In addition, related documents may be found on ePUC in Case Nos. 20-3324-PET, 17-3664-PET, and related earlier proceedings. Other related documents are on file with the Rural Utilities Service, the federal agency that approved WEC's Construction Work Plan and that finances WEC's implementation of the Construction Work Plan. WEC also maintains files of its dealings with RUS that relate to the current Construction Work Plan.

WEC wishes to fully respond to this request and is happy to package and file additional specific documents or categories of documents. Because potentially responsive

documents are numerous and voluminous, WEC suggests a conference to best manage production of any further documents required to fully respond to this request.

5. Q.PSD.WEC.1-18 requests additional information to explain the estimated reduction of revenue associated with net metering. In addition to these questions, WEC is requested to respond to the following questions:

- a. Regarding the \$235,114 decrease in rate-year revenue from expected additional net-metering systems, what is the basis for the expected additional net-metering systems? For example, are these net-metering systems that have already received a certificate of public good from the Commission?
- b. Beyond the summary of all pending net-metering applications requested in the Department's discovery request 1.18.c, what assumptions formed the basis for this adjustment?

RESPONSE: Please see supplemental testimony submitted by Louis Porter (and exhibit attached to Mr. Porter's testimony) and Shawn Enterline.

6. Q.PSD.WEC.1-5 requests additional details on the "construction and other changes to the [Coventry] landfill." In addition to responses to the Department's questions, please explain whether WEC considers the costs of alternative power supply during Coventry outages as part of its decision on when to perform construction and maintenance. And more generally, please provide an explanation of how WEC decides when to perform construction and maintenance at the Coventry Landfill.

RESPONSE: Please see Louis Porter's supplemental testimony.

7. Referring to page 4 of Mr. Porter's testimony, please explain why Tier III costs are accounted for in customer accounts and not power supply?

RESPONSE: Please see Louis Porter's supplemental testimony.

8. Also, on page 4 of Mr. Porter's testimony, he states that WEC "plans to account for the impact of net metering as a power supply cost, rather than decreased revenue" in the future. Please explain the rationale for WEC previously including these costs as decreased revenue rather than power supply costs.

RESPONSE: Please see Louis Porter's supplemental testimony.

9. On page 7 of Mr. Enterline's testimony, he states that the price for the Ryegate resource is \$107.27/MWH and that this is the price during the last month of the test year. Please explain why this is appropriate given the legislative changes in Act 155 and pending litigation in Case No. 22-3944-PET. In that case, in an Order dated 10/26/22, the Commission authorized a six-month extension at \$0.10/kWh beginning November 1, 2022.

RESPONSE: Please see Shawn Enterline's supplemental testimony and exhibit attached to Mr. Enterline's testimony.

January 23, 2023

WASHINGTON ELECTRIC  
COOPERATIVE, INC.



by: \_\_\_\_\_

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