

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Washington Electric Cooperative, Inc.)
for Approval of 14.19% Rate Increase) Case No. 22-4100-TF
effective on a service-rendered basis commencing)
November 1, 2022)

WASHINGTON ELECTRIC COOPERATIVE, INC.'S COMMENTS
IN RESPONSE TO JULY 3, 2023 PROCEDURAL ORDER

Washington Electric Cooperative, Inc. (WEC) provides the following comments in response to the July 3, 2023 Procedural Order.

1. WEC withdraws the two revised tariffs it filed on June 21, 2023. WEC relies on the compliance tariffs filed on June 1, 2023.

2. Historically, WEC has not increased fixed fees as part of rate increases. WEC's prior rate increases and related tariffs have been reviewed and approved without commensurate increases in fixed fees.

3. WEC did not include increases in certain fixed fees in the proposed tariffs filed with its petition in this matter, and did not provide specific notice that fixed fees would be increased commensurate with the proposed rate increase.

4. In response to the compliance tariffs WEC filed on June 1, 2023, the Department advised that certain fixed fees should be increased as part of a rate increase. WEC accordingly filed two revised tariffs (the June 21 revised tariffs). Initial research indicates that other distribution utilities include commensurate increases to certain fixed fees as part of their general rate increases.

5. WEC wants to assure that there are no potential issues involving notice, transparency, the ability to comment, and the process available to its members.

6. WEC intends to file a petition to revise other tariffs in the coming months, hopefully within two months. WEC's internal process for revising these other tariffs is well underway.

7. In the interim, WEC respectfully proposes to consult with the Department and determine whether the fees noted in the Procedural Order should be included as part of the anticipated petition.

8. As part of the anticipated petition, WEC will provide public notice of, and the bases for, all tariff revisions within the petition's scope. WEC's petition could also provide the bases for any decision to not include any of the fees noted in the Procedural Order.

9. WEC's proposal would address the questions posed by the Hearing Officer in the July 3, 2023 Procedural Order. WEC's proposal would also assure full notice and process, and address Mr. Bushman's comments.

10. WEC's proposal would also save time and resources. Avoiding potential issues and litigation and instead jumping straight to a process that would vet any changes to fixed fees would be more efficient, particularly because WEC already plans to file a petition to revise certain tariffs.

July 5, 2023

WASHINGTON ELECTRIC
COOPERATIVE, INC.

by:



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