

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power for approval )  
of its Zero Outages Initiative as a Strategic )  
Opportunity pursuant to 30 V.S.A. § 218d and ) Case No. 23-3501-PET  
GMP’s Multi-Year Regulation Plan )

**Green Mountain Power’s First Set of Interrogatories, Requests to Produce,  
and Requests for Admission to the Vermont Department of Public Service**

Pursuant to Public Utility Commission (“Commission” or “PUC”) Rules 2.103 and 2.214, and V.R.C.P. 33 and 34, Green Mountain Power (“GMP”) serves the following interrogatories and requests for production of documents on the Vermont Department of Public Service (“DPS”) to be answered separately and fully under oath by delivering its answers and all requested documents and materials to GMP’s counsel on or before April 2, 2024.

**Definitions and Instructions**

1. Reproduce the request being responded to before the response. GMP requests that parties provide electronic copies of discovery responses and serve responses to document requests electronically, in lieu of hard copies, when response materials are voluminous. All spreadsheets and computer data should also be provided electronically in a data-searchable format.
2. The response to each request should be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.
3. Where information requested is not available in the precise form described in the question or is not available for all year’s (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in your work papers and files or that is otherwise available.
4. These requests shall be deemed continuing to the full extent permitted by law. You are directed to change, supplement and correct your answers to conform to all information as it becomes available to you, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

5. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.

6. Some of GMP's requests may make particular reference to a portion of a filing in this matter. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to you that is responsive to the questions stated.

7. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity. "Identify all relevant documents" requires you to:

- a. State whether there is or was any document(s) which bears upon, discusses, or pertains to the facts or issues to which the interrogatory and the question is addressed;
  - b. Set forth in detail: (i) a description of the nature (i.e., letter, memorandum, etc.) and the exact contents of each such document(s); (ii) the name and address of the author(s), signer(s), recipient(s), and addressee(s) of each said document; (iii) where each said document is located; (iv) the date of each said document; (v) the name and address of the person(s) or other entity having custody, control or possession of each said document; and (vi) if a document, or copy thereof, is no longer in existence or is no longer in your custody, control, or possession, the name and address of the person(s) or other entity last having custody and/or possession of said document to the best of your knowledge and the reason for it no longer existing or being under your custody, control or possession.
8. "Identify and set forth the contents of all oral communications" requires you to:
- a. State whether there were any oral communication(s) bearing upon, discussing, or pertaining to facts or issues to which the interrogatory and question is addressed;
  - b. Set forth in detail: (i) the contents of each said oral communication; (ii) where and when each said oral communication occurred; (iii) the name and address of each person participating in each or any said communication; (iv) the name and address of each person present at each or any said communication; and (v) the nature, identity, and location of each and every document which bears upon, discusses or pertains to each or any said communication, and attach a copy thereof.

9. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. The term specifically includes and is not limited to written notes and communications such as reports, workpapers, handwritten notes, letters and emails.

10. "DPS" means Vermont Department of Public Service.
11. "PUC" means Vermont Public Utility Commission.
12. "GDS" means GDS Associates, Inc.
13. "You" and "your" as used in these interrogatories, means the DPS, each witness who has submitted testimony on behalf of the DPS, and each of their respective agents, employees, contractors and representatives.
14. Documents produced pursuant to these requests shall be organized and labeled in correspondence with the paragraph number to which they are alleged to respond. With respect to each document produced by the DPS identify the person who prepared the document and the date on which the document was prepared.
15. If in response to any request for information, the responding party asserts attorney client privilege, attorney work product, or any other privilege, please provide in addition to the basis of the privilege the date of the allegedly privileged communication(s), the identity of all persons who were party to the allegedly privileged communication(s) or who received photocopies of such communication(s), and the subject matter of the allegedly privileged communication.
16. 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 it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection. If any information is withheld on the grounds of privilege, immunity or qualified immunity, trade secrets, including without limitation, the work product doctrine or attorney client privilege, the following information shall be provided in a privilege log: (a) the basis upon which the privilege or protection is claimed; (b) the identity of the person who is the source of the information; (c) the identity of the person to whom the information has been communicated; (d) whether the information, or any part thereof, is based upon or evidenced by or is contained in any document and the identity of all such documents; and (e) the subject matter of the information and interrogatory to which it responds, sufficient for its identification.

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**Requests for All Witnesses**

- Q.GMP.1-1.** For each witness for whom DPS has submitted prefiled direct testimony:
- a. Please identify and produce all documents prepared by and/or relied upon by each witness, or any persons working for or under the direction of each witness, in connection with their testimony, including, but not limited to, the raw data and other results of any research or work conducted by the person, and any documents, data, research, articles, treatises or other information relied upon by the witness, including any documents generated by any other person which the witness consulted. For any document provided by GMP to DPS please just identify the document.
  - b. Please identify and produce in their original format all electronic files that were utilized or generated to prepare any exhibit, or any analysis, images, impressions, conclusions, or statements presented in either their prefiled testimony or any associated exhibits.

**Requests regarding prefiled testimony of Anne Margolis**

**Q.GMP.1-2.** In Ms. Margolis' opinion, if ZOI work was not started until after GMP's next IRP was reviewed and approved, when does she expect that work could commence? Please explain the basis for this opinion.

**Requests regarding prefiled testimony of Bill Jordan**

**Q.GMP.1-3.** Is the Department recommending that major storms be included in SQRP metrics for all utilities? If the answer is yes and major storms were to be included in SQRP metrics, does the Department believe the metrics would remain the same or need to change? Please explain why or why not.

**Requests regarding prefiled testimony of Kevin Mara**

**Q.GMP.1-4.** Please refer to Tables 2-4 on pages 9-11 of Mr. Mara's testimony.

- a. For each of the peer utilities included in Mr. Mara's comparison, describe what Mr. Mara, or anyone acting under his direction, reviewed with respect to the specific reporting requirements underlying the reliability statistics for those utilities that are reporting under "other standards" in EIA-861. Please identify and produce any documents reviewed or relied upon related to each peer utility.
- b. What is Mr. Mara's understanding of each peer utilities' exclusions from reporting requirements or other regulatory requirements that impact reliability reporting?

**Q.GMP.1-5.** Please refer to Mr. Mara's response to Question 12, page 9 and produce any documents relied upon or prepared in the process of responding to this question.

**Q.GMP.1-6.** Refer to exhibit DPS-KJM-5.

- a. Please provide all documents prepared and/or relied upon by Mr. Mara or any person working under his direction in the preparation of this exhibit, including but not limited to raw data, workpapers, and worksheets in their native format with all formula intact.
- b. Identify all documents, datasets, or other information Mr. Mara reviewed when "augmenting" the project lists in Exhibit DPS-KJM-5, including projects considered for but not included in the exhibit.

**Q.GMP.1-7.** Refer to Exhibit DPS-KJM-7. Please provide all documents prepared and/or relied upon by Mr. Mara or any person working under his direction in the preparation of this exhibit, including but not limited to raw data, workpapers, and worksheets in their native format with all formula intact.

**Q.GMP.1-8.** Please refer to Exhibit DPS-KJM-8 and pages 22 and 23 of Mr. Mara's testimony.

- a. Mr. Mara references 642 events of "five watts or less" in testimony, and 642 events of a 5.0 kWh. Please confirm which value and metric is used in Mr. Mara's analysis.
- b. Based on the answer to subpart (a), please describe in detail Mr. Mara's statement that 642 events used only [five watts] [5.0 kWh] or less, "which could be an indication of a depleted battery at a home," including all assumptions relied upon in reaching that opinion.
- c. Please provide all documents prepared and/or relied upon by Mr. Mara or any person working under his direction in the preparation of Exhibit DPS-KJM-8, including but not limited to raw data, workpapers, and worksheets in their native format with all formula intact.

**Q.GMP.1-9.** Please refer to page 13 of Mr. Mara's testimony and Table 5. Please confirm that the calculation that the "compounded growth rate in right-of-way maintenance has increased 5.3% between FY20 and FY24" was a simple comparison of the yearly vegetation management costs.

**Q.GMP.1-10.** On page 12, Mr. Mara's opinion is that enhanced vegetation management is a traditional method to address the primary cause of outages. Please produce any documents prepared by Mr. Mara calculating or related to the costs associated with the enhanced vegetation management methods he suggests (ground-to-sky clearing, increased trim width, expanded hazard tree removal, or shorter trim cycles) and the frequency of the recurrence of those costs? Please define 'ground-to-sky' clearing as used in this response, including any height limitations.

**Q.GMP.1-11.** Please provide (or identify if provided by GMP) all documents prepared or relied upon, in native format, in developing the scatter plot described on pages 28-29 and Table 8 on page 29.

**Q.GMP.1-12.** Please describe in detail how Mr. Mara developed his estimate of the cost to upgrade all rural circuits discussed on page 28. Please provide all supporting documentation in native format.

**Q.GMP.1-13.** For any of the utilities listed in Tables 2-4 on pages 9-11 that are also located in New England states, is Mr. Mara aware of any use or requirement to apply the NESC extreme wind or extreme ice (NESC Rule 250C and 250D) standard discussed on pages 19-20 to distribution lines (i.e. not joint-use or transmission poles)? If so, please identify which utilities.

**Q.GMP.1-14.** In reference to the NESC Rule 250C and 250D standards described on pages 19-20 of Mr. Mara's testimony, please identify and produce any documents or analysis Mr. Mara prepared or reviewed related to the potential cost differential of building infrastructure to these standards compared to GMP's current standard.

**Q.GMP.1-15.** Please provide all supporting calculations and documents in native format prepared by Mr. Mara in developing his conclusion on page 30, lines 1-6, that a 33% reduction in SAIFI and SAIDI should be established as a potential metric.

### **Requests regarding prefiled testimony of Steven Hunt**

**Q.GMP.1-16.** Does Mr. Hunt agree that the regulatory accounting approach GMP has proposed does not authorize the inclusion of specific O&M costs in rates as part of this filing? If not, please explain why not.

**Q.GMP.1-17.** Regarding Mr. Hunt's testimony on page 6, lines 10-14, does Mr. Hunt agree the baseline or measurable criteria he is recommending for assessing incremental ZOI O&M costs can be incorporated into and evaluated as part of the annual base rate review GMP proposed as part of the ZOI regulatory accounting methodology? If not, please explain why not.

**Q.GMP.1-18.** Regarding Mr. Hunt's testimony on page 10 regarding plant-in-service balances and retirements, does Mr. Hunt agree that it would be appropriate to utilize a methodology that nets the depreciation costs associated with any retired assets against new ZOI related depreciation costs, and only defer the net depreciation for inclusion in a future rate filing? If not, please explain why not.

**Q.GMP.1-19.** Regarding Mr. Hunt's testimony on page 10, lines 13-16 on potential costs savings associated with ZOI work, please identify any specific types of cost savings Mr. Hunt estimates would be sufficiently known and measurable within the first 12 months of completing ZOI related projects to include in the regulatory asset.

**Requests regarding prefiled testimony of Sean Foley & Jacob Thomas**

**Q.GMP.1-20.** Regarding Mr. Foley's and Mr. Thomas' testimony on page 6, lines 3-7 regarding the cumulative rate increase in the third year of the first phase of ZOI, please state the average annual increase associated with your calculation and provide all documents and analysis supporting the calculation in native format.

**Q.GMP.1-21.** Regarding Mr. Foley's and Mr. Thomas' testimony on page 8, lines 1-4 regarding the hypothetical rate increase associated with a full ZOI implementation, please provide all documents and analysis supporting your calculations in native format.

**Q.GMP.1-22.** Have Mr. Foley and Mr. Thomas conducted any analysis to determine what level of cumulative rate increases customers may experience over the same period used for their calculations on page 8, lines 1-4 if ZOI work is not completed? If not, please explain why not.

**Q.GMP.1-23.** Do Mr. Foley and Mr. Thomas agree that the regulatory accounting methodology proposed in this case imposes greater risk on GMP compared to the standard regulatory accounting approach that would otherwise apply to distribution system projects in a traditional cost of service proceeding? Please explain why or why not.

**Q.GMP.1-24.** Regarding the Department's proposed penalty metrics, are the interim operational metrics outlined in Option II designed with the Department's proposed \$50M capital limit in mind? Please explain why or why not.

**Q.GMP.1-25.** Regarding the Department's proposed penalty metrics, please provide backup calculations that led to "Est St. Dev." and "Scalar" coefficients for each "Target".

Dated at Burlington, Vermont, this 22<sup>nd</sup> day of March 2024.

GREEN MOUNTAIN POWER

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