

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-0969-PET

Tariff filing of Woodstock Aqueduct Company for a change in rates, pursuant to 30 V.S.A. § 225, effective for service rendered on or after May 16, 2024	
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**THE DEPARTMENT OF PUBLIC SERVICE’S FIRST
SET OF INFORMATION REQUESTS AND REQUESTS
FOR PRODUCTION SERVED UPON WOODSTOCK
AQUEDUCT COMPANY**

The Vermont Department of Public Service (“Department”) by and through Eric B. Guzman, Special Counsel, hereby serves the following First Set of Information Requests and Requests for Production upon Woodstock Aqueduct Company (the “Petitioner” or “WAC”) in this matter in accordance with Vermont Public Utility Commission Rules 2.214 and 2.230, and requests that the Petitioner answer the requests in accordance with Commission Rules 2.214 and 2.230 and deliver its answers and all requested documents and materials to the Department no later than **Friday, June 21, 2024**. The Petitioner is requested to provide one complete copy of all documents. The Petitioner is also requested to provide a copy of its answers in electronic format, that is, Word, Excel, or other format readable by the Department, and to provide any spreadsheets in electronic format.

INSTRUCTIONS

1. Responses to any and all Department requests that are contained herein or that may be filed later should be supplied to the Department as soon as they become available to the Petitioner. The Petitioner should not hold answers to any requests for which it has responsive data, documents, etc. until responses to any or all other requests are compiled.
2. Commission Rule 2.230(M)(3) requires the response to each request to 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 years (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 the Petitioner's workpapers and files or that is otherwise available.
4. These requests shall be deemed continuing and must be supplemented in accordance with Commission Rule 2.230(D). The Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available, 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 the Department's requests may reference a particular portion of the Petitioner's filings. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to the Petitioner 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.
8. "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. **All spreadsheets provided must be in native format and have all formulae and links intact and accessible.**
9. "Petition," as used herein, shall refer to the Petition filed by Woodstock Aqueduct Company

with the Vermont Public Utility Commission on April 2, 2024, unless the context indicates otherwise.

10. "Department," as used herein, shall mean the Vermont Department of Public Service.
11. "Commission," as used herein, shall mean the Vermont Public Utility Commission.
12. "Petitioner" and "WAC" as used herein, shall mean Woodstock Aqueduct Company
13. With respect to each document produced by the Petitioner, identify the person who prepared the document and the date on which the document was prepared.
14. If any interrogatory or request requires a response that the Petitioner believes to be privileged, please state the complete legal and factual basis for the claim of privilege and respond to the parts of the interrogatory or request as to which no privilege is asserted.
15. 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.
16. To expedite the discovery process and the resolution of this docket, the Petitioner should contact the Department as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.
17. The Department reserves the right to submit additional information requests to the Petitioner.

INTERROGATORIES & REQUESTS TO PRODUCE

Q.PSD.PET.1-1. Please produce the totals for each of the past five years (2019-2023) for the following expense categories:

- a. Operating: Backhoe expenses, Heat, Electricity, Operating Supplies, Repair and Maintenance, Truck and Travel
- b. A&G: Miscellaneous, Office Supplies and Expenses, Professional Services, Telephone

Q.PSD.PET.1-2. WAC's financial statements show Depreciation and Amortization Expenses, however these do not appear to be reflected in the filed cost of service. Please produce a depreciation and/or amortization record indicating WAC's rate year costs.

Q.PSD.PET.1-3. WAC's financial statements show Interest Income in the test year, however this does not appear to be reflected in the filed cost of service. Please produce WAC's anticipated rate year interest income.

Q.PSD.PET.1-4. Please explain whether WAC expects to receive any government grants, miscellaneous income, or other similar income in the rate year, as it did in the 2023 test year according to its financial statement. If so, please produce any documentation used to support your answer.

Q.PSD.PET.1-5. Please refer to the Prefiled Direct Testimony of Jireh Billings at page 10, stating, ". . . we anticipate that successfully recruiting a water utility manager will require a \$125,000 salary." Please provide an update on WAC's progress in hiring a professional manager, including whether the position has been posted or filled. Additionally:

- a. Please produce the job listing ad for the position, if posted.
- b. Please produce any supporting documentation that confirms hiring for the position will occur in the rate year.
- c. Please produce any supporting data and documentation used to support WAC's determination of the \$125,000 salary figure.

Q.PSD.PET.1-6. Please produce any data or documentation that provides a breakdown of the Salaries and Wages expenses totaling \$266,262 listed in Exh. WAC-JSB-1.

Q.PSD.PET.1-7. Please refer to the Prefiled Direct Testimony of Jireh Billings at page 12, lines 9 through 11. Please produce any meeting minutes, contract, or other documentation confirming the 10% wage increase and the start date.

Q.PSD.PET.1-8. Please produce any data or documentation that may support the Pension increase from \$0 to \$26,626 listed in Exh. WAC-JSB-1.

Q.PSD.PET.1-9. Please produce detailed amortization schedules for all the debt instruments included in the tab labeled “Cost of Debt” in Exh. WAC-JSB-1 and totaling \$160,218.04 for 2024.

Q.PSD.PET.1-10. Please refer to the Prefiled Direct Testimony of Jireh Billings at page 7, stating, “[t]o finance the Elm Street Crossing construction, we will need to further increase our annual debt expense by \$62,000 in the rate year and obtain approval to finance approximately \$665,000. . .”

a. Please explain whether WAC filed for and received PUC approval for this loan.

b. Please produce approved loan documentation verifying the principal and interest payments included in the cost of service.

Q.PSD.PET.1-11. Please refer to the Prefiled Direct Testimony of Jireh Billings at page 6, stating, “[w]e have also solicited construction estimates that demonstrate the cost of this work will be approximately \$665,000.”

a. The referenced Exh. WAC-JSB-2 is a scope breakdown dated September 2023. Please produce a signed contract, or an updated signed cost proposal, if available.

b. Please explain the anticipated length of time for this project to be completed.

c. Please explain the expected life of this project.

Q.PSD.PET.1-12. Please refer to the Prefiled Direct Testimony of Jireh Billings at page 8, lines 13 through 18.

a. Please explain whether there is any documentation from VEDA that can verify the length of the loan and the principal and interest included in the cost of service. If affirmed, please produce.

b. Please explain whether WAC has filed for PUC approval for this loan.

c. Please explain the anticipated length of time for this project to be completed.

d. Please explain the expected life of this project.

Q.PSD.PET.1-13. Please produce any data or documentation that provides a breakdown of the professional services expense of \$59,609 listed in Exh. WAC-JSB-1. Additionally:

a. Please explain how much of the cost increase included in the rate year is expected to be ongoing or whether the cost will be one-time or non-recurring. For those costs related to the sale and transfer of the water system, please explain the length of time those services are anticipated to be needed.

b. Please produce any documentation supporting any other services included in the rate year expenses that are not included in Exh. WAC-JSB-6, if applicable.

Q.PSD.PET.1-14. Please refer to Exh. WAC-JSB-5, SCADA Quote System Costs. The unsigned quote provided expired on March 12, 2024. Please produce an updated, signed version specifying when this work will be performed and the length of time it will continue.

Q.PSD.PET.1-15. Please explain whether the required pipe replacement expenses of \$150,000 and the SCADA system costs of \$45,300 will result in assets that remain in service and provide benefits beyond the rate year. If affirmed, what are the expected lifetimes and number of years for each to be fully depreciated. Please produce detailed schedules if there are different components in each project that have varying expected lifetimes or years to become fully depreciated.

Q.PSD.PET.1-16. Please refer to the Prefiled Direct Testimony of Jireh Billings at page 13, lines 3 through 7. Please provide any documentation to verify the ANR pipe replacement plan will occur and that supports the anticipated cost to WAC.

Q.PSD.PET.1-17. Please produce current copies of an example or redacted water bill for a typical residential customer, a commercial customer, and a customer with hydrants.

Q.PSD.PET.1-18. Please produce a copy of a mock-up water bill showing the impact of the new rates for a typical residential customer, a commercial customer, and a customer with hydrants.

Dated at Montpelier, Vermont this 7th day of June 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc. Service List