

# State of Vermont Public Utility Commission

## Motion to Intervene Form

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| <b>Intervenor and Case Information</b>   |   |
| <b>Case Number</b>   | 24-0969-TF  |
| <b>Name</b>  | Town and Village of Woodstock   |
| <b>Mailing Address</b>   | Street and # Woodstock Town Hall<br>31 The Green<br>Town Woodstock, VT 05091<br>State and Zip   |
| <b>Daytime Phone</b>   | 802-457-3456 ext 2103   |
| <b>E-mail Address</b>  | eduffy@townofwoodstock.org  |
| <b>Name of Legal Counsel (if any)</b>  | Joseph S. McLean, Stitzel Page & Fletcher PC  |
| <b>Mailing Address of Legal Counsel (if any)</b><br><small>(this is uncommon, leave blank if not applicable to your situation)</small>   | Street and # 171 Battery Street, P.O. Box 1507<br>Town Burlington, VT 05402-1507<br>State and Zip   |
| <b>E-mail Address of Legal Counsel (if any)</b>  | jmclean@firmspf.com   |
| <b>The Rule 2.209 Criteria</b>   |   |
| <b>Intervention as of Right</b><br><small>(this is uncommon, leave blank if not applicable to your situation)</small><br><br><b>Please identify any statute, legal rule, or Commission order that you think gives you a legal right to be a party in the case. If this right is conditional, please describe how you satisfy these conditions.</b> | N/A   |
| <b>Permissive Intervention</b><br><br><b>Please describe all the interests you have that you think will be adversely affected by the outcome of the case. Please be as specific as possible. Attach additional sheets if necessary.</b>  | <p>The Village and Town of Woodstock are the host municipalities for the privately owned water system that is the subject of this tariff filing case. The Woodstock Aquaduct Company provides water service, including both domestic/commercial water service and fire safety, to the Village and its residents and businesses. Those residents and businesses are directly impacted by this tariff case, which requests almost a 110% increase in Woodstock Aquaduct's overall revenue. Components of the water system are also located in the Town of Woodstock. In addition, the Town of Woodstock has been in active discussions/negotiations with the Aquaduct Company to potentially obtain ownership of the water system, its infrastructure and associated reservoirs and land. This tariff case may directly impact those negotiations and/or the Town's evaluation of whether it is in the public interest to acquire the system at this time. The Town of Woodstock Selectboard filed comments with the PUC by letter dated April 16, 2024, incorporated herein by reference as if fully set forth, expressing its concern about the proposed rate increase and asking that the PUC suspend the effective date of any tariff changes during the pendency of its negotiations. While this Motion to Intervene is filed one day late, the Village and Town will comply with all PUC orders moving forward, will adhere to the existing schedule so as not to delay these proceedings, and will contribute meaningfully to the investigation into the justness and reasonableness of the proposed rate increase without duplicating the DPS' efforts.</p> <p>Counsel for the Village and Town has consulted with counsel for the DPS who indicated that he had no objection to this request to intervene. We have also attempted to consult with counsel for the WAC, but have not received a response as of the filing of this motion.</p> |

**Please state whether there are other ways to protect your interest(s) besides as a party participating in this proceeding. If there is no other way for you to protect your interests, please state this fact. Please also explain whether there is already a party in the case who has the same or similar interest(s) to be protected in the case.**

To date, the only parties to this proceeding are Woodstock Aquaduct and the Department of Public Service. The Village and Town have interests in this proceeding that are separate and distinct from the other parties, as outlined above, and there is no other manner in which to protect those interests except through participation in this docket. There is no party in this case that has the same or a similar interest to the host municipalities and the PUC should, therefore, grant the Village and Town's request for intervention.

**Certification** This section may be completed by the intervenor or a duly authorized representative.

**I certify that the information provided on this form is true and accurate to the best of my knowledge.**

Print Name Joseph S. McLean

Signature JSM 

Date 6-14-2024

*Note: A signature is not required if this form is filed using ePUC, the Commission's online document management system, which is accessible at <https://epuc.vermont.gov>*