

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-0969-TF

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 SECOND
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 Second 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 **Wednesday, July 17, 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.2-1. Please explain WAC's anticipated depreciation and amortization expense for the Rate Year. Please produce all calculations demonstrating how the expense was derived.

Q.PSD.PET.2-2. Please refer to Exh. WAC-JSB-1's "Cost of Debt" tab. Please provide estimated 2024 interest payments and any supporting documentation for (i) Kubota Equipment Loan and (ii) Line of credit.

Q.PSD.PET.2-3. Please explain whether WAC would agree to include the following breakdown of information on its residential and commercial bills: (i) the dollar amount of the bill that is the base rate, (ii) the dollar amount of the bill that is usage over the base rate, (iii) total customer consumption included in the base rate and consumption over the base rate.

Q.PSD.PET.2-4. Please explain whether the hydrant charge will be billed on a monthly, quarterly, or annual basis to the Town of Woodstock.

Dated at Montpelier, Vermont this 5th day of July 2024.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc. Service List