

**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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**WOODSTOCK AQUEDUCT COMPANY’S RESPONSES
TO THE DEPARTMENT OF PUBLIC SERVICE’S
SECOND SET OF INFORMATION REQUESTS**

These are the responses of Woodstock Aqueduct Company (“WAC”) to the Second Set of Information Requests (“Information Requests”) from the Department of Public Service (“DPS”).

General Objections:

1. WAC objects to the “Instructions” contained in the Information Requests to the extent such instructions purport to place greater requirements on WAC, or reserve greater rights to the DPS than are permitted by the procedural rules of the Public Utility Commission.
2. WAC objects to any request for information or production of documents that is or are subject to the attorney-client privilege, that constitute work product, that are protected under state or federal law, or that are proprietary, competitively sensitive, or confidential.
3. WAC objects to requests to the extent that they (a) are overbroad or unduly burdensome; (b) are cumulative; (c) call for the production of documents not in the possession, custody, or control of WAC; (d) call for the review, compilation, or production of publicly available documents that could be obtained by the requesting party in a less burdensome manner; (e) are vague and/or ambiguous; (f) seek information not reasonably calculated to lead to the discovery of admissible evidence; (g) are not proportional to the needs of the cases and/or (h) call for the review, compilation, and/or production of a voluminous number of documents at great expense to WAC.
4. WAC does not hereby waive any objections, and reserves the right to later raise any additional, available objection.

WOODSTOCK AQUEDUCT COMPANY'S RESPONSES
TO THE DEPARTMENT OF PUBLIC SERVICE'S
SECOND SET OF INFORMATION REQUESTS

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.

A.PSD.PET.2-1: The depreciation and amortization expense for the Rate Year is expected to be similar to 2023. Please See **Attachments DPS.PET.2-1.1 and 2-1.2.**

Person Responsible for Response: Jireh Billings
Title: President
Date: July 17, 2024

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.

A.PSD:PET.2-2:

(i) Kubota Equipment Loan
KUBOTA Loan Information

Owner:
WOODSTOCK AQUEDUCT COMPANY

Account Number:
86250321 Current

Original Balance:
\$88,832.7012/10/2020

Current Balance:
\$26,649.6007/06/2024

Payoff Balance:
\$25,821.8107/21/2024

Frequency / Term:Monthly / 60 Months
Interest Rate:0.000%
Maturity Date:12/10/2025
Primary Model:KX057-4R3AP
Serial Number:KBCDZ36CLL3H33469

(ii) Line of credit.

The WAC has a 25,000 LOC with Mascoma Bank. The loan is fully drawn and the current cash flow will not allow any reduction in the test year. The current rate is 9% with a monthly payment of \$191.00 WAC does not expect much change in the test year.

Person Responsible for Response: Jireh Billings
Title: President
Date: July 17, 2024

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.

A.PSD.PET.2-3: Providing the breakdown of information described in this question would require WAC to incur significant expenses on software and hardware needed to implement the changes. WAC would also need to hire a consultant to implement the changes and devote substantial management time at additional cost. WAC does not currently have sufficient funding to implement these changes. In the event that WAC is able to improve its cash flow in the next several years—assuming the Town elects not to pursue acquisition of the utility—WAC would be agreeable to developing an assessment at that time regarding whether the described billing changes would be feasible and provide a cost benefit for customers.

Person Responsible for Response: Jireh Billings
Title: President
Date: July 17, 2024

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.

A.PSD.PET.2-4: The hydrant charge will be billed to the Town of Woodstock on a quarterly basis unless the Town seeks an alternative arrangement and WAC and the Town are able to reach agreement regarding an alternative schedule.

Person Responsible for Response: Jireh Billings
Title: President
Date: July 17, 2024

As to objections:

Dated at Burlington, Vermont this 17th day of July 2024

WOODSTOCK AQUEDUCT COMPANY

By: /s/ Owen McClain

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