

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-0991-TF

Tariff filing of the Village of Ludlow Electric Light Department for an overall rate increase of 21.5% effective on service rendered on or after July 1, 2025	
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**FIRST SET OF INFORMATION REQUESTS
SERVED UPON THE TOWN OF LYNDON ELECTRIC DEPARTMENT
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department”), by its counsel, Matthew Bakerpoole, hereby serves this First Set of Information Requests upon the Village of Ludlow Electric Department (“LED”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that LED answer the requests herein, conforming to Commission Rule 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Department no later than **Thursday, August 14, 2025**. Please provide LED’s answers in electronic format (i.e. Word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format (i.e. Excel spreadsheet).

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as LED is able to provide an answer or production. In other words, LED should not withhold a response to any requests for which it has responsive data, documents, etc. until LED is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires the response to each interrogatory to be made under oath by a person competent to testify concerning the response, as well as all documents and exhibits produced as part of the response. When responding to each request please state: (1)

the name(s) and title(s) of the person(s) responsible for preparing the response; (2) the administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question, or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). LED must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to LED. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of LED's filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

8. With respect to each document produced by LED, please identify the person who prepared the document and the date on which it was prepared.

9. If any interrogatory or request necessitates a response that LED believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

10. 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 to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

11. To expedite the discovery process and the resolution of this case, if LED wishes clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

12. The Department reserves the right to submit additional information requests to LED.

DEFINITIONS

13. “Identify,” when used in reference to natural person(s) or legal entities shall be interpreted to request the full name and current business address of said person(s) or entities.

14. “LED,” as used herein, means the Village of Ludlow Electric Department (“LED”).

15. “VPPSA,” as used herein, means the Vermont Public Power Supply Authority.

16. “ISO-NE,” as used herein, means ISO New England Inc.

17. “Department,” as used herein, means the Vermont Department of Public Service.

18. “Document,” as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. “Document” shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

19. “Farman pf.,” as used herein, means the Prefiled Testimony of Steven Farman.

INTERROGATORIES AND REQUESTS TO PRODUCE

Power Supply, Transmission, and Renewable Energy Standard Compliance

Q.DPS.LED.1-1. Referring to Exhibit VLED-HD-2 and VLED-HD-1:

- a. Please describe any changes to Forward Energy Market Prices since LED initially filed for the requested rate increase.
- b. Please quantify the impact of using more recent price assumptions on Rate Year Energy Market Costs in cell H29 and Rate Year Energy Credits in cell I26 of Exhibit VLED-HD-1.

Q.DPS.LED.1-2. Referring to Exhibit VLED-HD-6, please quantify how the change in Open Access Transmission Tariff Schedule 9 RNS rates for calendar year 2026 impacts LED’s adjusted rate year transmission costs.

Q.DPS.LED.1-3. Referring to Exhibit VLED-HD-9, Exhibit VLED-HD-10 and VLED-HD-11:

- a. Please identify any changes in renewable energy credit (REC) market eligibility of the McNeil and Ryegate biomass facilities that have occurred since LED filed this rate case;

- b. Please quantify any impacts these changes in eligibility will have on rate year REC revenues in Exhibit VLED-HD-9 and RES compliance costs in Exhibit VLED-HD-10 and VLED-HD-11.

Q.DPS.LED:1-4. Referring to Exhibit VLED-HD-11, please provide documentation supporting all REC price assumptions for Tiers I and II.

General Financial Information

Q.DPS.LED:1-5. Please provide a table of LED rate increases for the last five years including requested and allowed values for past increases both as revenue and percentage increases.

Q.DPS.LED:1-6. Please provide LED audited financial statements for the fiscal year ending December 31, 2024.

Q.DPS.LED:1-7. Is LED aware of any non-recurring items in its proposed cost-of-service? If so, please provide them with a description.

Q.DPS.LED:1-8. Please provide the annual expense totals for the past 5 years (2020-2024) for each of the accounts in:

- a. Customer & Sales (901-919);
- b. Admin & General (920-935); and
- c. Distribution (580-598).

Payroll

Q.DPS.LED:1-9. Referring to the Farman pf., at 5 and Exhibit LED-Farman-10B:

- a. Please specify and describe where the current union contract in Exhibit LED-Farman-10B provides for the approved 8.1% increase for union employees effective January 1, 2025;
- b. Please provide LED's Board of Commissioner Meeting Minutes reflecting the approval of a 5% wage increase applicable to non-union employees effective January 1, 2025;
- c. Please provide LED's Board of Commissioner Meeting Minutes authorizing a new Lineman Supervisor/Safety Officer position;
- d. Please provide any support for a 5% increase for all employees effective January 1, 2026.

Benefits

Q.DPS.LED:1-10. Referring to Farman pf. at 6 and Exhibit LED-Farman-13.

- a. Please provide an invoice or other documentation supporting BCBSVT's 2025/26 rate year annual healthcare premium of \$343,043.79.
- b. Please provide further explanation and any supporting documentation related to the OTHER BENEFITS Gifts & Adjust Annual 2025/26 rate year amount of \$102,000.

Depreciation

Q.DPS.LED:1-11. Referring to Farman pf. at 6 and Exhibit LED-Farman-11A, please provide an invoice or other similar document supporting the Bucket Truck estimated cost of \$448,902.

Customer Service

Q.DPS.LED:1-12. Please provide representative bills for both residential and commercial customers at the current rate.

Q.DPS.LED:1-13. Please provide representative bills for both residential and commercial customers reflecting the requested rate increase.

Dated at Montpelier, Vermont this 24th day of July 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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