

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL REGULATORY COMMISSION**

Versant Power

)

Docket No. ER20-1977-000

**RESPONSES OF VERSANT POWER TO THE
FIRST SET OF INFORMATIONAL DATA REQUESTS
OF THE AROOSTOOK ENERGY ASSOCIATION**

In accordance with the Protocols for Implementing and Reviewing Charges Established by the Attachment J Rate Formulas (the “Protocols”) of the Versant Power Open Access Transmission Tariff for Maine Public District (“MPD OATT”), Versant Power hereby submits these Responses to Data/Information Request No. 1 tendered by the Aroostook Energy Association on June 28, 2024 (hereinafter, the “Data Requests”).

Versant Power’s responses are based upon the best available information known to it as of the date of this response. While a good faith attempt has been made to identify all applicable objections, it may later be determined that further objections are relevant and appropriate. Accordingly, Versant Power expressly reserves the right to raise any such additional objections, concerning both general and specific matters, at any time that they may later be identified.

Versant Power objects to the Data Requests to the extent that they seek information not in the possession or control of Versant Power, seek information in a form other than that in which Versant Power’s files and records are maintained, seek information or documents protected by an applicable privilege, doctrine, law, or rule, and/or require Versant Power to undertake new studies or analyses. Versant Power further objects to the Data Requests as unduly burdensome to the extent that they request “any” or “all” materials.

Versant Power provides its attached responses to the Data Requests subject to and without waiver of the foregoing objections.

VERSANT POWER'S RESPONSES TO
DATA/INFORMATION REQUEST NO. 1
OF THE AROOSTOOK ENERGY ASSOCIATION
REGARDING 2024 MAINE PUBLIC DISTRICT OATT
FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED JULY 30, 2024

QUESTION NO. AEA-1-1

Please identify, describe, and quantify any errors or corrections that VP has discovered since the May 1, 2024, filing of the formula rate update. Please provide this information on a continuing basis.

OBJECTION NO. AEA-1-1

Insofar as this request asks for information to be provided on a continuing basis, Versant Power objects to this request as exceeding the parameters of the Attachment J Protocols of the MPD OATT, as well as Rule 403(d) of the Commission's Rules of Practice and Procedure, which Versant Power neither admits nor denies is applicable to the Annual Review Procedures under the Attachment J Protocols.

Notwithstanding and subject to the foregoing objections, Versant Power states as follows.

RESPONSE NO. AEA-1-1

Versant has identified no errors in the MPD OATT Annual Update subsequent to the May 1, 2024 filing.

Objection Prepared By: Counsel

Response Prepared By: Tim Olesniewicz, Senior Rates and Regulatory Analyst

List of Attachments: None

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RESPONSES PROVIDED JULY 30, 2024

QUESTION NO. AEA-1-2

Please provide copies of all data requests from and responses to other parties pertaining to the 2024 Annual Update.

RESPONSE NO. AEA-1-2

Public versions of data responses have been posted at:

<https://versantpower.com/oasis/annual-update-information-filing---2024-mpd/>.

Non-public versions of data responses will be provided to AEA's representative upon execution of a non-disclosure agreement between Versant Power and AEA.

Response Prepared By: Counsel

List of Attachments: None

VERSANT POWER'S RESPONSES TO
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RESPONSES PROVIDED JULY 30, 2024

QUESTION NO. AEA-1-3

Please provide a schedule of MPD transmission revenues received in 2023 by class (*i.e.*, transmission revenues for each retail and wholesale class).

RESPONSE NO. AEA-1-3

See AEA-1-3 Attachment A.

Response Prepared By: Tim Olesniewicz, Senior Rates and Regulatory Analyst

List of Attachments: AEA-1-3 Attachment A

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RESPONSES PROVIDED JULY 30, 2024

QUESTION NO. AEA-1-4

Please provide:

- a) A list of MPD transmission lines and substations as of December 31, 2023, and
- b) A tabulation of transmission plant investment by line/substation as of December 31, 2023.

RESPONSE NO. AEA-1-4

Please see pages 422-423 and pages 426-427 of Versant Power's 2023 FERC Form 1, as filed on May 21, 2024.

Response Prepared By: David Norman, Manager, Regulatory Support and Market Based Solutions

List of Attachments: None

VERSANT POWER'S RESPONSES TO
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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED JULY 30, 2024

QUESTION NO. AEA-1-5

In reference to 2024-2025 Estimated Charges, Exhibit 1b, lines 19.01 through 19.13, column c, please provide the detailed Company records, as referenced, supporting the 12-CP quantifications for each class including monthly 12CP for each class.

RESPONSE NO. AEA-1-5

See AEA-1-5 Attachment A.

Response Prepared By: Tim Olesniewicz, Senior Rates and Regulatory Analyst

List of Attachments: AEA-1-5 Attachment A

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RESPONSES PROVIDED JULY 30, 2024

QUESTION NO. AEA-1-6

In reference to 2024-2025 Estimated Charges, Exhibit 5, line 19, please provide:

- a) The total PBOP expense included in column a,
- b) The total PBOP expense allocated to MPD in column c, and
- c) The total allocated MPD PBOP expense allocated to transmission in column e.

RESPONSE NO. AEA-1-6

- a) \$1,868,765 as reported in WP FF1 Reconciliation line 62 col c.
- b) $\$1,868,765 \times \text{Customer Sales Allocator (24.04\%)} = \$449,254$
- c) $\$449,254 \times \text{Salaries \& Wage Allocator (10.66\%)} = \$47,897$

Response Prepared By: Tim Olesniewicz, Senior Rates and Regulatory Analyst

List of Attachments: None