

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

Versant Power

)

Docket No. ER20-1977-000

**INITIAL RESPONSES OF VERSANT POWER TO THE
FIRST SET OF INFORMATIONAL DATA REQUESTS
OF EASTERN MAINE ELECTRIC COOPERATIVE**

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 Initial Responses to the First Informational Data Requests tendered by Eastern Maine Electric Cooperative (“EMEC”) on June 24, 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 EASTERN MAINE ELECTRIC COOPERATIVE
REGARDING 2024 MAINE PUBLIC DISTRICT OATT CHARGES UPDATE
FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED JULY 24, 2024

QUESTION NO. EMC-1-1

Please provide copies of all the data requests received from the other parties and responses thereto.

RESPONSE NO. EMC-1-1

Public versions of data responses have been posted at <https://versantpower.com/oasis/annual-update-information-filing---2024-mpd/responses/>.

Non-public versions of data responses have been provided to counsel for EMEC.

Response Prepared By: Counsel

List of Attachments: None

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QUESTION NO. EMC-1-2

Please provide the documents and information Versant provided to ISO-NE or that Versant received from ISO-NE related to Versant's 2023-2024 estimated and actual charges.

RESPONSE NO. EMC-1-2

The MPD is not a part of ISO-NE and therefore has no such documents or information.

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

List of Attachments: None

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QUESTION NO. EMC-1-3

The comparison of Transmission Plant included in the Estimated and Actual charge calculations for the period for 2023-24 shows that the total value of Transmission Plant included in Actual charge calculations was higher than the total value indicated in the Estimated Charges by about \$5.0 million. Please provide the following information:

- a) Reasons for the difference between Actual charge calculations and Estimated Charges;
- b) Specific identification and description of the additional plant, including the Actual as opposed to the forecast date in-service date of plant, actual cost of the plant as opposed to the forecast cost, and a description of the plant;
- c) If the difference was due to cost escalation, please provide an explanation detailing the reason for the cost escalation for each such plant.; and
- d) An explanation of whether the plant had cost caps or price guarantees.

OBJECTION NO. EMC-1-3

Versant Power objects to this question as unduly vague particular insofar as it uses the undefined terms “additional plant,” “cost escalation,” “cost caps,” and “price guarantees.”

Notwithstanding and subject to the foregoing objection, Versant Power responds as follows.

RESPONSE NO. EMC-1-3

The differences are the result of (i) the use of actual 2022 data in both the Actual and Estimated files in the May 2023 MPD OATT Annual Update and (ii) the use of actual 2023 data in both the Actual and Estimated files in the May 2024 MPD OATT Annual Update.

To this effect, there are no forecasted values in the MPD OATT Annual Update. The change in Transmission Plant as indicated, is the difference between 2022 and 2023 investment values, and not changes to a prior forecast.

In any given Annual Update, the “Estimated” and “Actual” Charges calculations are based on the same year of data. For example, the “Estimated 2023-2024” charge calculations as filed in May 2023 are reflective of 2022 actual values. In the filing submitted in May 2024, the “Actual 2023-2024” charge calculations are reflective of 2023 actual values. As such the “Estimated 2024-2025” charge calculations are reflective of 2023 Actual values.

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Please see MPUC-MPD-1-09 Attachment A for the descriptive list of calendar year 2023
Transmission Plant additions.

Objection Prepared By: Counsel

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

List of Attachments: None

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QUESTION NO. EMC-1-4

In spite of the increase in Transmission Plant for Actual 2023-24 Changes [sic] as compared with Estimated 2023-24, Accumulated Depreciation included and Accumulated Deferred Income Taxes (“ADIT”) included in Actual Charges for 2023-2024 decreased from the amount included in Estimated 2023-24 charges by about \$256,000 and \$82,000 respectively. Please explain the reasons for this result and provide supporting calculations.

RESPONSE NO. EMC-1-4

Accumulated Depreciation included in 2023-2024 Actual Charges decreased from 2023-2024 Estimated Charges due to the retirement of fleet vehicles and operating equipment in the Maine Public District.

See Response No. EMC-1-3 for a further explanation of how Estimated 2023-2024 and Actual 2023-2024 charges were calculated. In this regard, Transmission Plant values that served as inputs for Actual 2023-2024 charges increased over those inputs for Estimated 2023-2024 charges. But, contrary to this question’s premise, ADITs related to depreciable plant related differences also increased when comparing the 13-month average for Actual 2023-2024 values over Estimated 2023-2024 values by \$1.35M, as detailed in Exhibit WP ADIT, Line 62, Column n. Overall, Account 282 ADITs did decrease year on year, but this decrease was attributable to smaller adjustments for IRC. Sec 162 Repair Deductions and IRC Sec 263A Capitalized Overheads when comparing Actual to Estimated. Please refer to Exhibit WP ADIT, Lines 69 and 70, Column n.

Response Prepared By: David Davoren, Tax Controller; Sarah Hesseltine, Manager Financial Reporting

List of Attachments: None

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QUESTION NO. EMC-1-5

- a) Please provide the amounts of Plant and O&M expenses associated with Interconnects.
- b) Please indicate amounts listed in the response to EMC 1-5 a) that are not excluded in computing the ATRR.
- c) Please provide the reason for not excluding amounts identified in EMC 1-5.

OBJECTION NO. EMC-1-5

Versant Power objects to this question as unduly vague particular insofar as it uses the undefined term “Interconnects.”

Notwithstanding and subject to the foregoing objection, Versant Power responds as follows.

RESPONSE NO. EMC-1-5

There were no Generation Interconnections to transmission lines placed into service in 2023 and, therefore, no Plant or O&M Expenses related to such interconnections included the May 2024 MPD OATT Annual Update.

Objection Prepared By: Counsel

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

List of Attachments: None

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QUESTION NO. EMC-1-6

Please provide a Table listing expenses paid to vendors similar to MPUC-MPD 1-33 Estimated 2024-25 Charges, Attachment A, provided as a part of evaluation of 2022-2023 Estimated charges.

OBJECTION NO. EMC-1-6

Versant Power objects to this question as unduly vague particular insofar as it refers to “MPUC-MPD 1-33 Estimated 2024-25 Charges, Attachment A” which is not the name of any attachment produced by Versant Power and, further, fails to identify the year for which the data is requested.

Notwithstanding and subject to the foregoing objection, Versant Power responds as follows.

RESPONSE NO. EMC-1-6

See MPUC-MPD-1-38 Attachment A.

Response Prepared By: Jennifer Ireland, Controller

List of Attachments: None

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QUESTION NO. EMC-1-7

Please provide the Management Bonus comparison included in Estimated 2024-25 charge.

OBJECTION NO. EMC-1-7

Versant Power objects to this question as unduly vague particular insofar as it uses the undefined term “Management Bonus comparison.”

Notwithstanding and subject to the foregoing objection, Versant Power responds as follows.

RESPONSE NO. EMC-1-7

See MPUC-MPD-1-40 Attachment A.

Response Prepared By: Jennifer Ireland, Controller

List of Attachments: MPUC-MPD-1-40 Attachment A.

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QUESTION NO. EMC-1-8

Please provide the amounts of the following payments included in the 2024-25 Estimated Charges.

IBM Corporation
J.D. Power and Associates
K&A Engineering Consulting expenses
Mason Associates
Modern Grid Partners
N. Harris Computer Corporation
RLC Engineering

RESPONSE NO. EMC-1-8

See EMC-1-08 Attachment A.

Response Prepared By: Jennifer Ireland, Controller

List of Attachments: EMC-1-08 Attachment A