

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

Versant Power

)

Docket No. ER20-1977-000

**INITIAL RESPONSES OF VERSANT POWER TO THE  
SECOND 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 Second Informational Data Requests tendered by Eastern Maine Electric Cooperative (“EMEC”) on August 9, 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  
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RESPONSES PROVIDED SEPTEMBER 10, 2024

**QUESTION NO. EMC-2-1**

Please refer to the response to MPUC- MPD 1-9. Has Versant excluded Project 131 N from the 2024-2025 Network Transmission charges? If yes, please provide the reference. If no, please explain the reason for not doing so.

**OBJECTION NO. EMC-2-1**

Versant Power objects to this data request as unduly vague insofar as it uses the undefined term “Network Transmission charges.” Subject to and notwithstanding the foregoing objection, Versant Power responds as follows.

**RESPONSE NO. EMC-2-1**

The reclass of Project 131N to BHD did not occur in Versant’s accounting records until May 31, 2024. The project values were therefore recorded in 2023 actuals used in the Formula rate update as filed on May 1, 2024.

**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-2-2**

Please refer to the response MPUC – MPD 1-28. Did Versant exclude the CIS related investments from the ATRR? If yes, please provide the reference thereto. If not, please explain the reasons for not doing so.

**OBJECTION NO. EMC-2-2**

Versant Power objects to this data request as unduly vague insofar as it uses the undefined term “the ATRR” without specifying whether this refers to the Wholesale ATRR or the Retail ATRR calculated by the MPD OATT Formula Rate. Subject to and notwithstanding the foregoing objection, Versant Power responds as follows.

**RESPONSE NO. EMC-2-2**

Versant Power did exclude the CIS related investments from the Wholesale ATRR as evidenced on Exhibit 2, Lines 6.2, 12.2 and 25, which remove the allocated transmission cost of the CIS investment from the Wholesale ATRR.

**Objection Prepared By:** Counsel

**Prepared By:** Kris Chahley, VP Finance & Treasurer

**List of Attachments:** None

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**QUESTION NO. EMC-2-3**

Please refer to the response to MPUC – MPD 1-22.

- a) Please provide a copy of the referenced Stipulation which authorized Versant to book the regulatory asset amortization amount to Account 560.
- b) Has this Stipulation been approved by FERC? If so, please provide a reference to such approval.

**RESPONSE NO. EMC-2-3**

- a) *See* EMC-2-03 Attachment A.
- b) Yes. *Versant Power*, 185 FERC ¶ 61,142 (2023).

**Response Prepared By:** Counsel

**List of Attachments:** EMC-2-03 Attachment A

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**QUESTION NO. EMC-2-4**

Please refer to MPUC – MPD 1-35 Attachment A CUI-PRIV.

Please explain the nature of VSH RECLAS expenses shown in Rows 1381-1391 for MPD.

**RESPONSE NO. EMC-2-4**

These expenses represent a Vacation/Sick/Holiday (VSH) reclass entry recorded quarterly. The Company's time entry system only allows for one default code for VSH time, which is then mapped to a specific FERC functionalized O&M account. For employees who share their time between Distribution and Transmission activities, a default mapping to a Distribution O&M account is often used for their VSH time. However, a portion of their VSH costs is reallocated to Transmission O&M based on the percentage of time their regular working time charged to Transmission.

**Response Prepared By:** Jennifer Ireland, Controller

**List of Attachments:** None

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**QUESTION NO. EMC-2-5**

Please refer to MPUC – MPD 1-36 Attachment A CUI-PRIV

- a) Are the amounts paid to Goodwin Recruiting in Row 319 related to recruiting for transmission service employees? If not, please explain the reasons for including these expenses in the ATRR.
- b) What services are provided by Paul Miller for which the expenses are included in Row 325?
- c) Please explain the nature of VSH+RECLASS expenses show in Rows 1381-1391 for MPD.

**RESPONSE NO. EMC-2-5**

- a) The referenced amounts paid to Goodwin Recruiting relate to recruitment and placement of engineers in T&D System Planning. These amounts were included in the calculation of charges under the MPD OATT Formula Rate insofar as the MPD OATT Formula Rate requires that the entirety of MPD amounts recorded to Account 566 be included as an input in Exhibit 5, Line 14, Column a.
- b) Paul Miller is the Company's Chief Operating Officer.
- c) See Response No. EMC-2-4.

**Response Prepared By:** Jennifer Ireland, Controller; Counsel

**List of Attachments:** None

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**QUESTION NO. EMC-2-6**

Please refer to MPUC – MPD 1-38 Attachment A CUI-PRIV.

Please provide in detail the nature of services provided by the following entities:

- a) APPS Associates (Rows 275-277)
- b) ETR LLC (Rows 283-284)
- c) Pro Search, Inc. (Rows 289-292)
- d) Quebit Consulting LLC (Rows 293-294)
- e) Bernstein et al (Rows 300, 732, 736, 738, 821, 822)
- f) Workgroup Technology Partner (Rows 572 - 574)
- g) DG Allocations (Rows 737, 868)
- h) Pro Search (Rows 915 - 917, 952, 953)

**RESPONSE NO. EMC-2-6**

- a) Apps Associates provides technical and functional support for the Company's Financial Information System.
- b) ETR LLC provides tax support for the Company's tax returns and tax accounting.
- c) Pro Search, Inc. provides staffing services.
- d) Quebit Consulting LLC provides technical and functional support for the Company's financial reporting application.
- e) Bernstein et al provides legal review, research, and opinions regarding regulatory and legal matters.
- f) Workgroup Technology Partners provides managed IT services, such as desktop support.
- g) DG Allocations represent the allocation of incurred costs to DG developers.
- h) See response to (c), above.

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**Response Prepared By:** Jennifer Ireland, Controller

**List of Attachments:** None



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**QUESTION NO. EMC-2-7**

Please refer to MPUC – MPD 1-39 Attachment A CUI-PRV

- a) This attachment also includes the expenses for the Year 2022. If these expenses are included in 2024-25 Estimated Charges and the Year 2023-24 Actual Charges, please explain the reasons for their inclusion.
- b) Rows 109 and 193 include Prepaid Expenses. Are these also included as Prepayments? If yes, please explain the reasons for doing so.

**RESPONSE NO. EMC-2-7**

- a) The expenses from Year 2022 were included in MPUC-MPD-1-39 Attachment A CUI-PRV as the data request asked for changes between Years 2022 and 2023. Year 2022 expenses were included for comparative information only.
- b) The Prepaid Expenses represent the amortization of the Company's insurance policies, which are initially set up as Prepayments, because they are paid upfront for the coverage period. These amounts were included in the calculation of charges under the MPD OATT Formula Rate insofar as the MPD OATT Formula Rate requires that the entirety of the amounts recorded to Account 165 and allocated to MPD be included as in an input in Exhibit 4, Line 29, Column r.

**Response Prepared By:** Jennifer Ireland, Controller

**List of Attachments:** None

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**QUESTION NO. EMC-2-8**

Please refer to the response to MPUC – MDP 1-39

Does the amount booked to Account 925 include any amount paid to a Claimant as part of a litigation or settlement? If yes, please provide the following information.

- a) Basis for the claim
- b) Whether the claim was settled or litigated
- c) Legal fees paid related to the claim which are booked to Account 925 or any other Account.

**RESPONSE NO. EMC-2-8**

The amount booked to Account 925 includes amounts paid to Claimants as part of settlement.

- a) These claims were based on minor damage to vehicles, circuit boards, property, or household appliances.
- b) All claims were settled.
- c) No legal fees were paid related to these claims.

**Response Prepared By:** Jennifer Ireland, Controller

**List of Attachments:** None

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**QUESTION NO. EMC-2-9**

Please refer to the response to MPUC – MPD 1-40 CUI-PRV

- a) Row 8 shows the BHD Pension & Retirement expenses. Are these expenses included in MPD ATRR? If yes, please explain the reasons for doing so. If no, please provide the reference showing the exclusion of these expenses.
- b) Please provide the bonus amounts for the Years 2022 and 2023 for the Versant (MPD) Officers included in the ATRR.

**RESPONSE NO. EMC-2-9**

- a) The BHD expenses were included in MPUC-MPD-1-40 Attachment A CUI-PRV as the data request asked for all charges to Account 926. The charges for BHD Pension & Retirement expenses are included in the MPD ATRR insofar as the MPD OATT Formula Rate requires that the entirety of amounts recorded to Account 926 be included as in an input in Exhibit 5, Line 19, Column a.
- b) The bonus amounts for Versant Power officers (BHD and MPD combined) recorded in 2022 and 2023 were \$881,325 and \$988,843, respectively.

**Response Prepared By:** Jennifer Ireland, Controller

**List of Attachments:** None

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**QUESTION NO. EMC-2-10**

Please refer to the response to MPUC – MPD 1-43 Attachment A CUI-PRV

- a) This attachment also includes the expenses for the Year 2022. If these expenses are included in 2024-25 Estimated Charges and the Year 2023-24 Actual Charges, please explain the reasons for doing so.
- b) Please provide in detail the nature of the following expenses:
  - i. Limitless Inc. (Row 2614)

**RESPONSE NO. EMC-2-10**

- a) The expenses from Year 2022 were included in MPUC-MPD-1-43 Attachment A CUI-PRV as the data request asked for changes between Years 2022 and 2023. Year 2022 expenses were included for comparative information only.
- b) Limitless Inc. provided labor and materials for the repainting of safety lines, truck stops, and columns at the Company's Fleet Garage.

**Response Prepared By:** Jennifer Ireland, Controller

**List of Attachments:** None