

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

Versant Power

)

Docket No. ER20-1977-000

**THIRD RESPONSES OF VERSANT POWER TO THE
FIRST SET OF INFORMATION DATA REQUESTS
OF THE MAINE CUSTOMER GROUP**

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 Third Responses to the First Information Data Requests tendered by the Maine Customer Group (“MCG”) on May 25, 2021 (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 MAINE CUSTOMER GROUP
REGARDING 2021 MAINE PUBLIC DISTRICT OATT
FERC DOCKET NO. ER20-1977-000
RESPONSES PROVIDED JUNE 21, 2021

QUESTION NO. MCG-1-3

Did MPD include any of the following costs/expenses in the Annual Transmission Revenue Requirement ("ATTR") included in the 2020 Update? If yes, please provide the following details:

- i. Penalties, fines, etc. by U.S. Internal Revenue Service, U.S. Environmental Protection Agency, the U.S. Department of Transportation or any other local, state and federal government agencies;
- ii. Disputed amounts (in excess of \$100,000) with Contractors;
- iii. Amounts exceeding the Contract amount by \$50,000 in the Contracts with the total original contracted amount exceeding \$100,000;
- iv. Derivative trading;
- v. Power Sales and trading; and
- vi. Gas and other non-electric business related costs.

OBJECTION NO. MCG-1-3

Versant Power objects to subpart (iii) insofar as Versant Power does not maintain its records in manner that would permit identification of such contracts without undue burden.

RESPONSE NO. MCG-1-3

- i. None.
- ii. None.
- iii. See objection.
- iv. None.
- v. See Response No. MCG-1-9
- vi. None.

Objection Prepared By: Counsel

Response Prepared By: Kris Chahley, VP Finance & Treasurer

List of Attachments: None