

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

Versant Power

)

Docket No. ER20-1977-000

**INITIAL RESPONSES OF VERSANT POWER TO THE  
THIRD 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 Initial Responses to the Third Information Data Requests tendered by the Maine Customer Group (“MCG”) on July 29, 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. 3  
OF THE MAINE CUSTOMER GROUP  
REGARDING 2021 MAINE PUBLIC DISTRICT OATT  
FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-1**

Please refer to the response to MCG 2-1. Does Versant book to A&G accounts any of the expenses related to the purchase and sale of power? If yes, please explain the reasons for not booking such costs to Power Supplies Account.

**OBJECTION NO. MCG-3-1**

Versant Power objects to this request as vague insofar as it uses the undefined term "Power Supplies Account." Notwithstanding and subject to the foregoing objection, Versant Power responds as follows.

**RESPONSE NO. MCG-3-1**

Yes. The subject expenses are administrative and general expenses associated with administering power purchase agreements that Versant Power was directed to enter into by the Maine Public Utilities Commission. Accounts 440, 447 and 555 reflect actual sales and purchase of energy, not the administrative costs associated therewith.

**Response Prepared By:** Counsel

**List of Attachments:** None

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DATA/INFORMATION REQUEST NO. 3  
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REGARDING 2021 MAINE PUBLIC DISTRICT OATT  
FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-2**

Please refer to MCG 2-02 Attachment A for each of the following:

- (a) With one exception, all the listed facilities have the Primary Voltage less than 69 kV. Does MPD consider all of these facilities as "Transmission"?
- (b) Note \*\*\* states, "Transmission Substation component of total facility cost." Which column amount shows the transmission related amounts?
- (c) Please provide the basis and workpapers used to allocate the amounts to Transmission.
- (d) Are all other amounts without "\*\*\*\*" related to Distribution and not included as Transmission Plant? If this is incorrect, how are these amounts categorized?

**RESPONSE NO. MCG-3-2**

- (a) Yes, Versant Power considers all of these facilities to be Transmission.
- (b) Column E - Facility Cost shows the Transmission related amounts. The rows with \*\*\* are substation related costs.
- (c) *See* MCG-3-2 Attachment A. In preparing this response, the Company identified an error in past data request responses with some 2021 plant in- service charges inadvertently included. MCG-3-2 Attachment A reconciles these amounts in the blue tabs.
- (d) All other amounts without \*\*\* are various Transmission lines which have costs that are not location specific.

**Response Prepared By:** Shane Tatro, Senior Corporate Accountant

**List of Attachments:** MCG-3-2 Attachment A

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DATA/INFORMATION REQUEST NO. 3  
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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-3**

Please refer to MCG 2-07 Attachment A for each of the following:

- (a) Is it correct that the costs shown under Column G are assigned to Transmission? If not, please indicate the nature of these costs.
- (b) Are the amounts under Column I the total facility costs? If not, please indicate the nature of these amounts.
- (c) Please provide the basis and workpapers for assigning costs to Transmission.
- (d) The note at the bottom states "69 kV or Above". Does this note mean that the costs of all the blue shaded facilities are assigned to Transmission? If not, what does the blue shading indicate?
- (e) How are the costs of "unshaded" facilities categorized and treated in computing the ATRR?
- (f) Are the costs not designated as Transmission excluded in computing the ATRR? If not, please explain the reasons for not doing so.

**RESPONSE NO. MCG-3-3**

- (a) It is correct that the costs shown under Column G are assigned to Transmission. These were new additions in 2020 for the specific projects identified.
- (b) The costs in Column I are the total facility cost for the identified locations.
- (c) *See* MCG-3-3 Attachment A. In preparing this response, the Company noted an error in past data request responses with some 2021 plant in-service charges inadvertently included. MCG-3-3 Attachment A reconciles these amounts in the blue tabs.
- (d) Yes, the blue shaded facilities are assigned to Transmission with a voltage of 69 kV or above.
- (e) The "unshaded" facilities are also Transmission but at Transmission voltage less than 69 kV, i.e. 34.5 kV or 46 kV.
- (f) All costs reflected in MCG 2-07 Attachment A are designated as Transmission.

**Response Prepared By:** Shane Tatro, Senior Corporate Accountant

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DATA/INFORMATION REQUEST NO. 3  
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REGARDING 2021 MAINE PUBLIC DISTRICT OATT  
FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**List of Attachments:** MCG-3-3 Attachment A

VERSANT POWER'S RESPONSES TO  
DATA/INFORMATION REQUEST NO. 3  
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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-4**

Please refer to MCG 2-08 Attachment A for each of the following:

- (a) Please describe what "ADDITION\_AMOUNT" under Column G and "Facility Cost" under Column I indicate. Please describe the nature of the amounts listed under Columns G and I.
- (b) Please indicate the amounts that are included as Transmission.
- (c) Please provide the basis and workpapers for allocating the amounts to Transmission.
- (d) Under Column I, there are notes such as "See row I3", "See row I4", "See row I18", "See Row I23", "See row I26", and "See row I32". Please describe why these references were added and what such references are supposed to indicate.

**RESPONSE NO. MCG-3-4**

- (a) "Addition Amount" reflects the new additions in 2020 for the specifically identified projects and FERC accounts listed. "Facility Cost" is the total amount in our fixed asset register for a specific location (facility).
- (b) All amounts in Column G and I are Transmission as they are listed under FERC Transmission accounts.
- (c) *See* MCG-3-4 Attachment A. In preparing this response, the Company noted an error in past data request responses with some 2021 plant in-service charges inadvertently included. MCG-3-3 Attachment A reconciles these amounts in the blue tabs.
- (d) These references guide the reader to look at the cell indicated for the total facility cost. In this data set, the same facility is listed multiple times based on project number or date placed in service. The intent was to not put the same facility total multiple times in case the column was summed, as this total would not reflect actual amounts in service.

**Response Prepared By:** Shane Tatro, Senior Corporate Accountant

**List of Attachments:** MCG-3-3 Attachment A

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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-5**

Please refer to MCG 2-09 Attachment A for each of the following:

- (a) Tabs MPUC-MPD 1-14 Attachment A and MPUC-MPD 1-15 Attachment A have blue shaded notes. Do these notes mean only the blue shaded facilities have voltage levels above 69 kV? If not please explain what the blue shading means. What amounts in Column G for the blue shaded projects are categorized as a Transmission component?
- (b) Do all other non-shaded facilities have voltage levels below 69 kV? If not, please provide the voltage levels of each of such facilities.
- (c) Please indicate the facilities for which costs are not included as a part of Transmission Plant.
- (d) Please provide the basis and workpapers for allocating the amounts to Transmission.
- (e) There is no note in Tab "MPUC-MPD 1-16 Attachment A. Does the absence of a blue-shaded note mean that all of these facilities have voltage below 69 kV? If not, please indicate the facilities with voltage level above 69 kV.
- (f) Do the numbers under Column "Category\_FERC" indicate FERC Account numbers? If not, what do they indicate?

**RESPONSE NO. MCG-3-5**

- (a) Only the blue shaded rows are 69 kV and above as indicated by the key on each tab. The total amount in Column G is categorized as Transmission.
- (b) Yes, all other non-shaded facilities have voltage levels below 69 kV.
- (c) All facilities in MPUC-MPD 1-14 Attachment A and MPUC-MPD 1-15 Attachment A are included in Transmission Plant.
- (d) *See* MCG-3-5 Attachment A.
- (e) MPUC-MPD 1-16 asked the following: "In reference to Versant Power's 2020 FF1 page 207, line 87, column d, Account 390 – Structures and Improvements, please provide a detailed description of the Retirements in the amount of \$2,765,325." Therefore, there is no Transmission component to this question or response.
- (f) Yes, these are the FERC accounts used to unitize the assets for each project listed.

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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**Response Prepared By:** Shane Tatro, Senior Corporate Accountant

**List of Attachments:** MCG-3-5 Attachment A



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DATA/INFORMATION REQUEST NO. 3  
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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-6**

Please refer to the response to MCG 2-9 (b) which states, "The Transmission component of the total facility cost is \$2,510,167." Tab MPUC-MPD 1-14 Attachment A of MCG-2-09 Attachment A shows the amount of \$20,815.68 for Project 403C in Column G of Row 26.

Please describe the nature of these two amounts. Also, please reconcile these two amounts and indicate the amount included as Transmission.

**RESPONSE NO. MCG-3-6**

The Transmission component of the total facility cost of the Flo's Inn 69 kV substation is \$2,510,166.96, and this is the cost included in the ATRR. The amount shown in MCG-2-09 Attachment A of \$20,815.68 for Project 403C is the total of new additions to FERC Subaccount 35501 in 2020. *See* MCG-3-06 Attachment A. When preparing this response, the Company noted an error in past data request responses with some 2021 plant in-service charges inadvertently included. MCG-3-06 Attachment A reconciles these amounts in the blue tabs.

**Response Prepared By:** Shane Tatro, Senior Corporate Accountant

**List of Attachments:** MCG-3-06 Attachment A

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DATA/INFORMATION REQUEST NO. 3  
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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-7**

Please refer to response to MCG 2-10 (a) for the following:

- (a) Please provide example documents, if any, prepared by the listed organization that refers to the transmission service or transmission customer.

**RESPONSE NO. MCG-3-7**

WorkHealth LLC invoices were charged to a general and administrative account.

18 C.F.R. Part 101, Account 923 Outside Services Employed provides that:

This account shall include the fees and expenses of professional consultants and others for general services which are not applicable to a particular operating function or to other accounts. It shall include also the pay and expenses of persons engaged for a special or temporary administrative or general purpose in circumstances where the person so engaged is not considered as an employee of the utility.

Athletic trainer services provided by WorkHealth LLC is includable as a person engaged for a special and general purposes under circumstances where the person engaged is not considered an employee of the utility. The services provided support the organization and therefore indirectly support all transmission customers and services.

**Response Prepared By:** Sarah Hesseltn, Manager, Financial Reporting

**List of Attachments:** None

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DATA/INFORMATION REQUEST NO. 3  
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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-8**

Please refer to response to MCG 2-12 for the following:

- (a) Does the response mean that the wholesale transmission rate increased while the retail transmission rate decreased? If the response does not mean that that the wholesale transmission rate increased while the retail transmission rate decreased, please explain why this incorrect. If the response does mean that that the wholesale transmission rate increased while the retail transmission rate decreased please explain why the wholesale transmission rate increased while the retail transmission rate decreased.

**OBJECTION NO. MCG-3-8**

Versant Power objects to this request as vague insofar as it uses the undefined terms “wholesale transmission rate” and “retail transmission rate”. Notwithstanding and subject to the foregoing objection, Versant Power states as follows.

**RESPONSE NO. MCG-3-8**

The following table shows the ATRRs and certain unit rates under the May 3, 2021 initial informational filing and the June 14, 2021 revised informational filing.

	May 3, 2021 Filing	June 14, 2021 Filing
Wholesale ATRR	\$ 9,228,831	\$ 9,206,353
Wholesale \$/kW/Month	\$ 8.70	\$ 8.85
Retail ATRR	\$ 9,606,370	\$ 9,552,246
Residential \$/kWh	\$ 0.018105	\$ 0.018003

As shown, both the wholesale and retail ATRRs decreased from the May 3, 2021 filing to the June 14, 2021 filing. The wholesale unit rate increased, however, as a result of the Applicable 12-CP Demand kW Value decreasing from 88,391 to 86,739, *see* Exhibit 1 at 13a, as result of correction of the 12-CP value for December 2020, *see* Exhibit 8 at 12a.

**Response Prepared By:** Counsel

**List of Attachments:** None

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FERC DOCKET NO. ER20-1977-000

RESPONSES PROVIDED AUGUST 18, 2021

**QUESTION NO. MCG-3-9**

Please refer to the response to MCG 2-13 for the following:

- (a) Please indicate how the Houlton Water Company's Point-to-Point load and revenue are incorporated in computing the transmission service rates.

**RESPONSE NO. MCG-3-9**

Point to Point revenue is recorded on Exhibit 7, lines 1-9 as applicable. Total Transmission related revenues from Exhibit 7 line 21, flow to Exhibit 2, line 31 as a credit against the Wholesale Revenue Requirement.

Point to Point load is excluded from the Exhibit 8 values, and thus excluded from the load used on Exhibit 1a "Applicable 12-CP Demand KW Value", lines 3, 8, 13, 18, and 23 for rate making purposes.

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

**List of Attachments:** None