



July 16, 2021

Rhode Island Public Utilities Commission  
Ms. Luly Massaro  
Commission Clerk  
89 Jefferson Blvd.  
Warwick, RI 02888

Re: RIPUC Docket No. 5134  
Division 1<sup>st</sup> Data Request

Dear Ms. Massaro:

On behalf of Pascoag Utility District Electric Department (Pascoag or the District), we herewith file an original and nine copies of Pascoag's responses to Division's First Set of Data Requests. The District has included two copies of the PDF files. The Excel files will be uploaded to the RIPUC and will be posted to the Docket Page and circulated to the service list.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Harle J Young  
Manager of Finance and Customer Service

Service list

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: PASCOAG UTILITY DISTRICT : DOCKET NO. 5134**  
**APPLICATION TO CHANGE RATES :**

**First Set of Data Requests of the  
Division of Public Utilities and Carriers to  
Pascoag Utility District**

DIV 1-1 Please provide in electronic (Excel or Excel compatible) format copies of all schedules and workpapers created in the process of filing the current rate change application.

**Response:**

Please see the attached excel spreadsheets: 1-1 DGB Test Year, Rate Year & COS schedules, 1-1 DGB rate design & ratepayer impact schedules, 1-1 calculation of load by customer, 1-1 four years of Electric billing and consumption

Witness responsible: David G. Bebyn, CPA

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DIV 1-2 Please provide in electronic (Excel or Excel compatible) format copies of Pascoag Utility District's (PUD) revenue requirement, cost of service study, cost allocation, proof of revenue, and rate design workpapers in the current rate increase request.

**Response:**

Please see the response and attachments to Division 1-1

Witness responsible: David G. Bebyn, CPA

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DIV 1-3 Please provide in electronic (Excel or Excel compatible) format copies of PUD witness David Bebyn's testimony tables, Schedules and Exhibits.

**Response:**

Please see the response and attachments to Division 1-1

Witness responsible: David G. Bebyn, CPA

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DIV 1-4 To the extent not already being provided in response to DRs 1-1 through 1-4, please provide all Excel files, including applicable formulas, for the Exhibits that were filed with PUD's application, specifically for those Exhibits that were prepared in Excel.

**Response:**

Please see the attached excel spreadsheets: 1-4 (2.9(e) Impact of new Rates-Customer Classes, 1-4 (2.9(G) PUD Operating Leases, 1-4 (2.9(j) Summary of Overtime Expenses, 1-4 (2.9(n)(2) Loss of Transmission of Electricity, 1-4 (2.9(n)(3) Energy Used by PUD Elec, and 1-4 (2.9 (m) Expenses Associated with PUD's Cost of Service.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-5 To the extent not already being provided in response to DRs 1-1 through 1-5, please provide all Excel file workpapers for calculations supporting the Direct Testimony and Exhibits that were filed with PUD's application.

**Response:**

Excel file workpapers to support calculations previously provided in responses to DRs 1-1 through 1-4.

Witness responsible: David G. Bebyn, CPA

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DIV 1-6 Please provide a complete copy of PUD's current chart of accounts

**Response:**

Please see the attached excel spreadsheet label 1-6 Chart of Accounts.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-7 Please provide copies of PUD's detail general ledger for 1.) the most recent fiscal year ending (December 31, 2020); and 2.) all months beginning January 2021 through the present. If available, please include the Excel version with your response.

**Response:**

Please see the attached excel spreadsheet labeled 1-7. The tab labeled 1-7.1 is for the year ending December 2020. The tab labeled 1-7.2 is for the current year-to-date through July 6, 2021. Please be advised that the power bills for June will not be received until the end of July, therefore the month end close for June will not be complete until the first week of August.

Witness responsible: Harle Young and David G. Bebyn, CPA



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DIV 1-8 1-8. Provide copies of PUD's capital and operating budgets for fiscal years 2020 and 2021. If all or portions are available in Excel, please include the Excel version with your response.

**Response:**

Please see the attached excel spreadsheet Labeled 1-8 Approved Operating and Capital Budgets 2020 & 2021.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-9 Please provide a complete copy of the presentations to the Board which resulted in the Board approval of PUD's rate filing. Also provide a copy of the Board approval

**Response:**

No presentation was made to the Board, since Board approval is not required to file a rate case with the PUC. Under Rhode Island general laws, PUD's electric department is regulated by the Public Utility Commission. Specifically, under general laws Chapter 45-58-8(6), "...the utility district shall operate and be subject to regulation of its retail rates for electricity under title 39 of the general laws when operating within its utility service area". The Board was informally notified of PUD's application for a rate change, and had no issue with management proceeding with the filing.

Witness responsible: Michael Kirkwood

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DIV 1-10 Please provide, in Excel, the trial balances for the 12 month period ending June 30, 2020. Please provide the information by account and subaccount.

**Response:**

Please see the excel spreadsheet 1-10 Summary Trail Balance July 2019- June 2020.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-11 Please provide, in Excel, the trial balances for the 11 month period ending May 31, 2021. Please provide the information by account and subaccount. As soon as the data becomes available, please supplement your response to this request with the June 2021 trial balances.

**Response:**

Please see the excel spreadsheet 1-11 Summary Trial Balance July 2020 through May 2021. As soon as the data becomes available, we will supplement our response to this request with the June 2021 trial balances sometime in August.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-12 Please provide the contract with PUD and B&E Consulting for services related to the current rate case.

**Response:**

Please see PDF attachment 1-12 Agreement for Professional Service-DGB signed.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-13 With respect to the RIPUC assessment, please identify and provide the most current RIPUC assessment to PUD.

**Response:**

Please see PDF attachment 1-13 RIPUC Assessment to PUD.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-14 Identify the number of actual PUD employee positions as of each date: (1) 6/30/2019; (2) 6/30/2020, (3) 5/31/2021, and as soon as the data becomes available: (4) 6/30/2021.

**Response:**

Please see the attached PDF files: 1-14 (1) 6-30-2019 Payroll, 1-14 (2) 6-30-2020 Payroll, 1-14 (3) 5-31-2021 Payroll, and 1-14 (4) 6-30-21 Payroll.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-15 Refer to Schedule DBG-4a. Identify the status of all unfilled job recruitment efforts for unfilled positions as of 5/31/2021 and identify the anticipated hire date for each position that is in the process of being recruited and filled.

**Response:**

As of 5/31/2021, PUD had recently accepted the resignation of both members of its two-man tree crew, consisting of one Arborist and one Utility Worker. The tree crew has been extremely difficult to staff over the past 10 years, so for the foreseeable future, PUD management has decided to instead determine the annual savings in salary and benefits from not staffing the positions, and apply that annual dollar amount to a competitively bid contract with an outside tree contractor for our tree trimming activity along the town and state streets. We have had good luck with that approach at times over the past several years when members of our tree crew were out on injury for extended periods. We have decided to allocate those dollar resources to a contract for services at this time. In addition, we plan to retain tree removal equipment in house, so that our line crew members can fill in with short term tree issues that come up from time to time, such as on direct customer services as opposed to maintenance trimming of the primary and secondary wires on the streets.

Witness responsible: Michael Kirkwood



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DIV 1-16 Does the application of funds from the Good Neighbor Energy Fund reduce PUD's uncollectibles expense? If not, show in detail how PUD applies the funding in the Good Neighbor Energy Fund.

**Response:**

The money that the District receives from Good Neighbor Energy Fund is applied to the active customers account. Our software would apply this to the oldest receivable balance at that time. It does not reduce the write off account. Please see the example in attached PDF 1-16 Good Neighbor Energy Funds.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-17 For each property insurance policy, please identify provide a copy of the most recent invoice.

**Response:**

Please see attachment PDF 1-17 Property Ins.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-18 For each Workers Compensation insurance policy, please identify and provide a copy of the most recent invoice.

**Response:**

Please see attachment PDF 1-18 June Beacon-Workers Comp.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-19 For the health, dental, long-term health & disability and life insurance, please identify and provide a copy of the most recent invoice.

**Response:**

Please see the following attachments: PDF 1-19 June Blue Cross, 1-19 June Delta Dental, 1-19 June Principal-Life AD&D & LTD, 1-19 June UNUM-LTC, and 1-19 June VSP Vision.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-20 For each type of insurance listed on Schedule DGB-RY-2, identify and provide the most recent invoice..

**Response:**

Please see attachment PDF 1-20 Current Invoice.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-21 For the premium credit item on Schedule DGB-RY-2, please identify the comparable premium credit amounts for each year, 2017 through 2021 and for 2021 to date.

**Response:**

Please see attachment PDF1-21 Premium Credits.

Year of Credit	Premium Credit	Electric Department Portion 80%
Premium Credit Received 2017 from 2016	\$1,038	\$830.40
Premium credit received 2018 from 2017	\$1,640	\$1,312
Premium credit received 2019 from 2018	\$1,586	\$1,268.80
Premium credit received 2020 from 2019	\$1,546	\$1,236.80
Premium credit received 2021 from 2020	\$1,662	\$1329.60

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-22 Please identify and provide the PUD's most current five-year capital plan.

**Response:**

Please see Excel spreadsheet 1-22 Capital Budget- Electric 2021-2025 Final.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-23 Refer to Mr. Bebyn's testimony at page 16, lines 20-21. In using the FICA tax cap, please clarify whether the intention was to use the 2020 cap of \$137,700 or the 2021 cap of \$142,800, or some other amount.

**Response:**

The intent was to use the cap for 2021 which is \$142,800, however the calculation and testimony used the 2020 cap of \$137,700.

Witness responsible: David G. Bebyn, CPA



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DIV 1-24 Refer to Mr. Bebyn's testimony at page 16, lines 8-15. Please provide comparable W-2 payroll amounts in total and by position for (1) calendar 2020, and (2) for the 12 months ending 6/30/2021 as soon as it is available.

**Response:**

Please see attached PDF 1-24 6-30-21 Payroll Journal, PDF 1-24 2020 W2 and PDF 1-24 2020-2021 Paychex Quarterly Reports, and PDF Q2 20021 Quarterly Reports. Please note that the Payroll journal is for 16 employees but we have two employees out on Temporary Caregivers Insurance (TCI) at this time.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-25 Refer to Mr. Bebyn's testimony at page 11, lines 21-27. Identify and provide the current contract with the outside provider for custodial expense.

**Response:**

The outside contract for custodial is with Coverall Cleaning Systems. The monthly charge is \$889 per month or \$10,668 annually. This contract does not include liners, paper supplies and toiletries. The District paid \$3,774.77 in supplies in 2020. Please see attachment 1-25 Outside Provider of Custodial.

Witness responsible: Harle Young and David G. Bebyn, CP

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DIV 1-26 Refer to Mr. Bebyn’s testimony at page 12, lines 27-29. Identify and provide the current contract with the outside provider for auditing services.

**Response:**

For 2021, the Auditing Fee is \$45,000 and the electric company is responsible for 80% of this for a total of \$36,000. The cost to the Electric Department will increase by \$800 each year over the next four year 2022-2025. Please see attachment PDF 1-26 for the Professional fees, the RFP and the engagement letters. A copy of their complete proposal is available upon request

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-27 Refer to Mr. Bebyn's testimony at page 13, lines 1-4. Identify and provide the invoices related to the IT and cybersecurity cost amount of \$109,480.

**Response:**

Please see PDF 1-27 Invoices totaling \$109,480, which consist of the General Ledger activity for 2020 and the invoices. Please see PDF 1-27 Integrated IT Agreement, the monthly cost of the Managed Security Program will be \$2,250 per month along with the Security Service implementation of \$10,000. In this contract we will also see an increase of \$300 monthly to the Managed Services Monthly Recurring Service (per Endpoint) starting in 2022.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-28 Board member health care plan. Refer to Mr. Bebyn's testimony at page 15, lines 24-25. Identify and provide the most current invoice for the board member health care policy.

**Response:**

Please see the attached PDF 1-28 June Medicare –Board Members.

Witness responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-29 Refer to Schedule DBG-RY-11. Identify and provide the PUD debt service schedule showing the amounts of principal and interest and the total payments due in each month of 2019, 2020 and 2021 for which actual information is available and projected through each month of the rate year and through 2025.

**Response:**

The debt service payments are due semiannually every March and September.

The follow table presents the debt service payments thru 2025

Date	Principal	Interest & Fees	Total
09/01/20	\$ 65,000.00	\$ 6,081.51	\$ 71,081.51
03/01/21		\$ 11,799.04	\$ 11,799.04
09/01/21	\$ 90,000.00	\$ 11,799.04	\$ 101,799.04
03/01/22		\$ 11,295.04	\$ 11,295.04
09/01/22	\$ 91,000.00	\$ 11,295.04	\$ 102,295.04
03/01/23		\$ 10,744.49	\$ 10,744.49
09/01/23	\$ 91,000.00	\$ 10,744.49	\$ 101,744.49
03/01/24		\$ 10,152.99	\$ 10,152.99
09/01/24	\$ 92,000.00	\$ 10,152.99	\$ 102,152.99
03/01/25		\$ 9,527.39	\$ 9,527.39
09/01/25	\$ 93,000.00	\$ 9,527.39	\$ 102,527.39

Please note that there were no debt service payments for 2019 as there were no bonds outstanding at that time.

Witness responsible: David G. Bebyn, CPA

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DIV 1-30 Identify and provide a copy of the provisions of the RIIB bond indenture that provides for the coverage ratio of 125%.

**Response:**

I could not find the provision for the coverage ratios of 125% for the Pascoag debt service with Rhode Island Infrastructure Bank (RIIB). Normally, this 125% coverage for RIIB water and wastewater loans is covered by section 205 of the water and wastewater bond indentures. This loan with the RIIB is part of the Efficient Buildings Fund and only a loan agreement with RIIB covers the terms of this loan. A copy of the loan agreement is attached to this response. Section VII of the agreement, which covers compliance and reports, is silent regarding any coverage. Debt service reserve covered under Article III maintains a balance funded from the bond proceeds. Not having a 125% coverage will not impact this filing since the additional 25% coverage above the annual debt service funding was to be covered by the use of capital reserve funds which are already in rates.

Witness responsible: David G. Bebyn, CPA

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DIV 1-31 Refer to Mr. Bebyn's testimony at page 17, lines 9-11. Please identify and provide the specific details of the NBC and WWD debt service coverage upon which Mr. Bebyn is relying as being similar to the PUD proposed calculation.

**Response:**

Mr. Bebyn relied on Docket 3639 for NBC from Mr. Edge's direct testimony. In this docket, debt service coverage was being funded annually and the subsequent year was being used to fund capital programs. In Docket 4879 for the Woonsocket Water Division, Mr. Bebyn proposed utilizing WWD's current IFR funding to support the debt service reserve, which would become available the subsequent year to fund IFR programs. This funding was presented on schedule RY-13 of Mr. Bebyn's direct testimony. Since WWD had a sufficient cash reserve in its capital program, WWD minimized its rate increases by utilizing the capital program funds to cover the debt service coverage.

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Witness responsible: David G. Bebyn, CPA



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DIV 1-32 During 2019, 2020 or 2021 has PUD received any customer complaints concerning the application of the demand ratchets? If yes, identify and provide copies of those complaints if in writing or a brief summary of the nature and timing of such complaints if not in writing.

**Response:**

To our knowledge, we have not received any complaints during 2019, 2020 and 2021. We have received complaints within the last ten years regarding the demand ratchet. Unfortunately, none of these complaints were expressed in writing but through phone calls. Below are some of the companies we have spoken to about the demand ratchet in the past.

- Overlook Nursing Home-2018
- Bliss Golf Course-2014
- Taco Shop-2014
- Niko's Pizza-within the last 10 years
- Abby's Restaurant-business was open from 2009-2015
- Elite Pizza-business was open from 2009-2010
- Sweet Tomato Pizza business was open from 2010-2015
- Excellent Breakfast-business was open from 2015-2018
- The Washboard LLC-business was open from 2009-2013
- Hawaiian Nails and Spa-business was open from 2014-2016

The complaints were all roughly the same. The demand ratchet was tough on their businesses because if they hit the demand once, they would be charged that demand for the next eleven months unless they hit a higher demand. They also argued that there was no way for them to make adjustments to their energy usage under this rate structure. If they tried to figure out ways to conserve their electricity, it wouldn't matter until eleven months or more down the road. Additionally, the

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summer months proved to be especially tough for small businesses because of the added expense of air conditioning. Free energy audits were always offered to customers with high bill complaints.

Witness responsible: Desarae Dolan and David G. Bebyn, CPA

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DIV 1-33 Refer to Schedule DBG-RY-9, showing schools and seminars expense for the interim year and rate year.

- (a) Please provide comparable information for (1) actual 2020 and (2) the 12 months ending June 30, 2021.
- (b) What is the DC Legislative Rally?
- (c) What is the NISC?

**Response:**

- a) Please see the Excel 1-33 a. GL Activity Schools and Seminars and PDF 1-33 a. Schools and Seminar Invoices Jan 2020-May 2021.

Witness responsible: Harle Young and David G. Bebyn, CPA

- b) The DC Legislative Rally is an annual Washington fly-in event hosted by the American Public Power Association (APPA) Pascoag participates as part of its involvement with the local association, Northeast Public Power Association (NEPPA), and on behalf of its own customers.

Each year, APPA and NEPPA debate and formalize policies and issues of importance to public power's consumer focused mission, and the legislative fly-in involves public power entities such as PUD scheduling meetings with the office of each congressional delegation member, and sitting down with them to express our concerns and preferences for any legislation being debated in Congress, or for the possibility to introduce legislation important to public power. We are often fortunate enough in Rhode Island to have these meetings attended by our delegation members; Senators Reed and Whitehouse, and Representatives Langevin and Ciciline. This effort has allowed us to forge great relationships with our federal team, and they are often on the look-out and will contact us when confronting issues that may affect our constituents.

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Witness responsible: Michael Kirkwood

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: PASCOAG UTILITY DISTRICT : DOCKET NO. 5134  
APPLICATION TO CHANGE RATES :**

**First Set of Data Requests of the  
Division of Public Utilities and Carriers to  
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c) National Information Solutions Cooperative (NISC) is an information technology company that develops and supports software and hardware solutions for Member Owners who are primarily utility cooperatives and broadband companies across the nation. NISC is an industry leader providing advanced, integrated IT solutions for Consumer and subscriber billing, accounting, engineering & operations, as well as many other leading edge IT solutions.

Witness Responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-34 Please provide the monthly sales and revenue for 2019, 2020 and 2021 to date for PUD's largest customer, Daniele Prosciutto Inc. (DPI).

**Response:**

Please see excel file 1-34 DPI monthly Sales and revenue attached to the electronic copy. The table below presents the annual totals.

Year	Total Revenue	Total KWH Usage	Total KW Demand	Total Billed KW Demand
2019	\$559,855.07	5,027,680	11,611.28	14,012.72
2020	\$360,184.65	3,567,600	8,868.24	12,806.24
Jan-June 2021	\$161,919.22	1,608,960	4,152.56	4,895.52

Witness Responsible: Harle Young and David G. Bebyn, CPA

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DIV 1-35 Refer to the testimony of Mr. Kirkwood at page 8. Will the cost of the second meter to be installed for the non-grandfathered customers be charged to the customer at whose location the new second meter is being installed? Has PUD included proposed updated terms and conditions related to the installation of second meters? Please explain.

**Response:**

PUD does not intend to charge the customer directly for the second meter. Since the cost of a net-meter is generally higher than the cost of two separate meters intended to determine both the house load and the renewable generator production, this should not be an issue, which causes a greater level of subsidization from other customers.

The proposed update to our Net Metering Policy, as filed in this proceeding, is intended to be the full set of changes that encompass the terms and conditions such customer would fall under.

Witness responsible: Michael Kirkwood