

**Green Mountain Care Board**  
144 State Street  
Montpelier, VT 05602

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www.gmcbboard.vermont.gov

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## **DELIVERED ELECTRONICALLY**

February 10, 2020

Mr. Charles Storrow, Esq.  
Storrow & Buckley, LLP  
One Blanchard Court, Suite 101  
Montpelier, VT 05602

Mr. Todd Kummer  
Vermont Open MRI  
620 Hinesburg Rd.  
South Burlington, VT 05403

**RE: Docket No. GMCB-014-19con, Replacement of MRI System and Relocation of Services to 3000 Williston Road**

Dear Mr. Storrow and Mr. Kummer:

Thank you for the information you provided on January 22, 2020 for the above-referenced project. There are still significant discrepancies in the financial documents you submitted. For example, the Profit and Loss statement (P&L) shows \$168,500 for management fees and approximately \$40,803 in miscellaneous expenses that are not reflected on the other financial tables. All expenses and income to make the proposed project fully operational must be included in all applicable financial documents.

**Note: All requests below refer to the documents submitted on January 22, 2020 unless otherwise noted.**

1. Include the \$168,500 management fee and approximately \$40,803 in miscellaneous expenses previously unreported in financial Tables 3, 4, and 5 A for fiscal year 2018 and also include any management fees and additional miscellaneous fees in subsequent years for Tables 3, 4 and 5 A, B and C for 2019-2022 and resubmit.
2. Identify the total cost associated with the shielding and specify the line item where that same cost is included in the quote from All Access Building, LLC you included with your November 26, 2019 submission. In addition, confirm whether this expense for shielding and associated costs are included in the total project cost on financial Table 1 and identify the line item where it is reflected on Tables 3, 4, and 5 B and C. If not included, revise and resubmit financial Tables 1 and Tables 3, 4, and 5 B and C.



3. **Tables 3, 4, 5, and 6 A:** The A tables reflect what your business would be assuming no change in your current business and location. Please revise and resubmit Tables 3, 4, 5, and 6 A, B, and C by including numbers in the A tables for 2021 and 2022 (you may include zeros if that is the case).
4. **Table 4 C:** The line item titled “Land, Buildings and Improvements” under the heading “Less Accumulated Depreciation” for 2019 was over written. Please do not overwrite any formulas in your resubmissions. Please revise and resubmit this table.
5. **Table 8 B:** Latest actual (2018) should be zero. Please revise and resubmit this table.
6. **Tables 9 B and C:** Tables 9 B and C have errors. For Table 9 B, the latest actuals (2018) should all be zero. Table 9 C will self-correct after you correct Tables 9 B. Please revise and resubmit these tables.
7. Please explain why you have not submitted Vermont Open MRI’s most recent audited financial statement, as previously requested. If you cannot provide an audited financial statement, please provide your most recent Vermont State Tax Return. If you believe the tax return is exempt from public inspection and copying under Vermont’s Public Records Act, please submit a detailed request for confidentiality under GVCB Rule 4.403(4).

In responding, restate the question in bold font and respond in unbolded font. Send an electronic copy to me at [donna.jerry@vermont.gov](mailto:donna.jerry@vermont.gov) and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.

If you have any questions, please do not hesitate to contact me at 802-828-2918.

Sincerely,

*s/ Donna Jerry*

Donna Jerry

Senior Health Policy Analyst

cc. Michael Barber, General Counsel  
Green Mountain Care Board

