Date Filed: October 06, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Consumer Counsel

Question:

Field Operations Expense (Overhead Lines Operations & Maintenance). Refer to Schedule C-3.0, line 32, and Schedule C-3.16. Explain in detail the reason for the $3.433 million increase in expense in the Rate Year over the 2025 level. Provide documentation supporting the increase (quotes, invoices, contracts)

Response:

The Company is unable to follow the references in the interrogatory to: (1) Schedule C-3.0, line 32, which is Fee Free expense as compared to; (2) Schedule C-3.16, which is Field Operations (Overhead Lines – Operations and Maintenance); and (3) a reference to a $3.433 million increase that the Company is unable to tie back to either the Fee Free expense or Field Operations expense. In an effort to be responsive, the Company interprets the question to relate solely to Schedule C-3.16 Field Operations (Overhead Lines-Operation & Maintenance), noted on line 33, of Schedule C-3.0, which has an increase in expense of $2.623 million in the Rate Year over the 2025 level.

The Company first adjusted the $19.467 million 12/31/2025 Test Year level of Field Operation Expenses (Overhead Lines Operations & Maintenance) by $1.286 million as shown on line 25, column (C) of Schedule WP C-3.16. The $1.286 million pro forma adjustment removed out of period adjustments totaling $1.320 million and $(34) of costs associated with the Line Crew Rodeo. The 2025 Test Year Pro Forma amount of $20.753 million represents a normalized level of Field Operation Overhead Line expenses. The $1.337 million Rate Year increase was calculated using the projected GDP-PI inflation factor for the Interim and Rate Year period. The Company used this approach to determine the Rate Year amount because GDP-PI measures the change in prices of goods and services produced in the United States and the Field Operations schedule is composed of a wide range of costs including outside contractors, permits and fees, police services, and employee expenses.

The Field Operations Overhead Line Maintenance Rate Year amount of $22.090 million represents a $2.623 million increase over the $19.467 million 2025 Test Year amount; $1.286 million Test Year Pro Forma Adjustment plus $1.337 million Rate Year adjustment equals $2.623 million.