Date Filed: August 18, 2026

Witness: Amparo Nieto
Request from: Connecticut Industrial Energy Consumers

Question:

(Amparo Nieto (ACOSS)) Explain the rationale behind the decision to allocate meter plant as described on page 6, lines 21 through 25, of Nieto's Direct Testimony. Include in your response workpapers in their native format with all cells and formulae unlocked (if applicable) that demonstrate how the meter plant allocators were determined.

Response:

The Company calculated the total loaded meter plant cost for each rate class, using as the basis for this calculation the meter types that are currently used to provide meter services for each class, the number of meters of each type, and the unit installed loaded cost per meter type. The loaded meter plant costs include loaded labor costs, and any use of vehicle and IT-related costs involved in installation. Once these costs are calculated for the range of meter types used in a class, the costs were summed for each customer class. The resulting class-based allocated costs form the basis for the ACOS allocation factors.

The explanation at page 6, lines 21-25, in Ms. Nieto's Direct Testimony is meant only to reflect that the meter plant allocation factors are not merely based on the number of meters by class, rather the factors also reflect the relative unit cost differentials among the meter types used for different customer classes. The class weighting factors were computed for informational purposes. The workpaper associated with the class allocation factor for meter plant is provided as CIEC-005, Attachment 1.