Date Filed: September 23, 2026

Witness: Lavelle A. Freeman and Gerhard Walker
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-1 at 49. State whether the Company evaluated each capacity project using historical forecast accuracy, only committed new-customer loads, and expected weather instead of 90/10 weather. For DER-driven projects, state whether historical DER completion and delay rates were considered. If such analyses were performed, provide them, including the resulting need date and project timing.

Response:

The Company does not evaluate future capacity projects based on historical forecast accuracy.

The Company uses only "firm" new customer loads in its step load modifier to the forecast. All capital projects are developed based only on those firm new customer loads in the forecast.

The term "expected weather", without further clarity of definition, is taken by the Company to mean "weather scenario that can be expected." The Company defines its 90/10 weather scenario as the highest 3-day weighted-average temperature humidity index recorded over the past 10 years. By definition therefore any 90/10 weather condition taken for the forecast by the Company has occurred once over the past decade and can therefore be expected to occur again over the next decade. The Company does not increase those weather assumptions from what was recorded over the past 10 years.