Date Filed: October 26, 2026

Witness: David L. Gladey, Lavelle Freeman, John P. Dipaola-Tromba, Jennifer A. Schilling and Elli Ntakou
Request from: Department of Energy and Environmental Protection

Question:

(Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4, p. 13. Please define and explain an "optimal climate adaptation plan," and describe how this plan can be developed and implemented within the Company's estimated 18-month schedule from approval?

a. Can the Company explain why Phase 3 of the Vulnerability Assessment remains incomplete as of the date of this interrogatory issuance?

Response:

Although what the "18-month schedule" is referring to and what approval is referred to, the Company's reference to optimizing the climate adaptation plan refers to proceeding with investments that are effective and efficient in increasing the resilience of the system. As outlined in the analysis of the risk in CLP-TSP-4, the climate conditions assessed as part of the climate vulnerability study are for 2050. This gives the Company sufficient time to deploy potential needed climate adaptation mitigations. The Company notes that recent studies indicate that the pace of climate change may dictate that such analyses are repeated in later years or are performed regularly with some periodicity that is appropriate to capture changes in climate conditions from the previous study. This is of course dependent on the periodicity of the Global Climate Models (GCM) updates.