Date Filed: August 21, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Education, Outreach, and Enforcement

Question:

(FINANCIAL IMPACT AND COST RECOVERY) Quantify the total costs incurred by the Company associated with fraudulent account activity (including write-offs, administrative costs, and collections activity) for each year from 2018 to present and explain whether and how such costs are recovered through rates.

Response:

Please refer to the table below for total costs incurred by the Company associated with fraudulent account[1] activity for each year from 2018 to present. The uncollectible expense associated with fraudulent account activity is recovered in the same manner as any other uncollectibles. If the account that is deemed uncollectible is designated as hardship it will be recovered through the SBC in the annual Rate Adjustment Mechanism ("RAM") process, while non-hardship account uncollectibles are included as either part of base rates that are set in the Company's last base distribution rate case or through the Generation Service Charge ("GSC").

Dollar Amount of Write-Offs Associated with Fraudulent Activity	
Year	**Dollars Written Off**
2018	$122,198
2019	$106,618
2020	$64,437
2021	$123,243
2022	$117,271
2023	$184,622
2024	$127,182
2025	$66,750
2026*	$24,842

*Through July 2026

[1] For the purpose of this response, the Company defines fraudulent activity as identity theft, where an individual uses another person's identity to establish utility service.