Date Filed: September 15, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, where the Company proposes "a declining, time-limited discount applied to incremental load over a five-year term, consistent with the declining structure proposed in the Company's prior economic development rate."

a.Please provide the structure of the discount under the Company's prior EDR.

b.Did the Company consider other participation term durations? If so, provide the alternatives the Company considered and explain why each alternative was ruled out. If not, why not?

Response:

a. Please refer to OCC-462, Attachment 1.

b. The Company considered longer-term EDR periods (e.g., previously offered long-term EDR riders had terms of up to 10 years). Such riders had extensively negotiated terms and applied to bundled rate structures, and were more expansive and relevant for the period in which individual service agreements were applied (e.g., prior to restructuring where bundled rates and services applied, and often involved business retention and distribution generation alternatives evaluated over the longer term structure). As a working proposition the Company is focusing on a shorter, 5-year period within which to provide EDR benefits to individual customers, under current rate structures.