Date Filed: October 30, 2026

Witness: Jessica B. Cain, Brendan J. O'Brien, Garrett J. Murray and Daniel M. Traynor
Request from: ALLCO

Question:

(Follow-up to ALLCO-116, ALLCO-117, and ALLCO-118 — legal collections.) State: (a) the FERC account(s) in which the fees paid to the Law Offices of Alexander G. Snyder LLC are recorded and the amount of such fees included in the Test Year and Rate Year cost of service, with the schedule and workpaper reference (ALLCO-117, subpart (b)); (b) the commission rate or fee schedule under the Company's engagement of that firm, and the date and approver of the engagement; (c) from the Company's own records rather than the Judicial Branch case-lookup site, for each year 2021 through 2025, the number of collection actions filed, the aggregate amount claimed, the aggregate amount of judgments obtained, and the aggregate amount collected; (d) the persons by title who supervise the engagement and review its cost-effectiveness; and (e) whether any analysis has been performed of the cost per dollar collected under the engagement in light of the increase in fees from $376,048 in 2022 to $1,632,968 in 2025, and if so produce it.

Response:

a. The fees associated with the Law Offices of Alexander G. Snyder LLC ("AGS") were recorded to FERC accounts 903005 and 904000. The Test Year and proposed Rate Year amounts are $1.633 million and $1.738 million, respectively, included in Schedule C-3.20 line 20.

b. The Company engages AGS under a contingent fee arrangement, wherein AGS receives a percentage of amounts successfully collected on accounts referred to the firm for collection. In addition, the Company reimburses AGS for certain out-of-pocket litigation expenses, including court filing fees and service of process costs. AGS is not entitled to any commission on accounts for which no funds are recovered.

c. During the 2025 Test Year, the Company referred 986 accounts to AGS with an aggregate balance of $4.2 million. Total receipts collected during the year were $7.7 million. This amount includes payments received on accounts referred to AGS during 2025, as well as payments from accounts referred to AGS in prior years that had payment arrangements or judgments[1]. The total amount paid to AGS for collection services associated with these recoveries was approximately $1.6 million during 2025.

[1] The Company doesn't record the number of judgments obtained by third-party legal collections firms it works with.

d. The Director of Collections and Assistance Programs is responsible for the supervision and review of cost effectiveness.

e. The increase in fees paid to AGS between 2022 and 2025 is attributable to the contingent fee structure of the engagement, under which AGS is compensated based on a percentage of amounts successfully collected. Accordingly, as collection recoveries increased during this period, the corresponding fees paid to AGS increased proportionately.