Date Filed: September 28, 2026

Witness: Amparo Nieto
Request from: Office of Consumer Counsel

Question:
(ACOSS) Refer to Exh. CLP-ACOS-1, Exh. CLP-ACOS-2, and Exh. CLP-RATES-1. In a live, unlocked Excel format with all links and formulas intact, please provide an alternate version of the ACOSS and of Table 1 under Exh. CLP-RATES-1, for each of the following scenarios:

a. In which FERC Accounts 364-368 are classified as 100% demand-related;
b. In which the primary distribution portion of FERC Accounts 364-368 are classified as 100% demand-related.

Response:

These scenarios conflict with, and do not reflect the use of, well-established methodologies that have been applied by the Company and approved by PURA. In response to this request, the Company is providing the results of the allocations requested under each scenario, and further has replicated the process in developing Table 1 in its Application to prepare an illustrative Table 1 for each scenario. The Company does not support or endorse these cost analyses or tables provided in response to parts a. or b.

a. Please refer to OCC-729, Attachment 1 CONFIDENTIAL, for the modified ACOS study with FERC Accounts 364-368 classified as 100% demand-related. The resulting unit costs are included in tab T.0 Summary Unit Costs.

Below is an illustrative Table 1 for this scenario:

Table 1: Rates of Return at Current and Proposed Rates

	Current Rates		Proposed Rates	
Rate Codes	Rate of Return	Class to Total	Rate of Return	Class to Total
Rate 1 & 7	1.2%	1.1	7.9%	1.0
Rate 5	-0.3%	-0.3	6.7%	0.9
Rate 18	-12.4%	-11.8	2.1%	0.3
Rate 27, 27A, 30, 30A & EV-S	3.8%	3.6	10.6%	1.4
Rate 29	-5.6%	-5.3	0.3%	0.0
Rate 35, 37 & EV-M	0.9%	0.8	7.8%	1.0
Rate 39	-4.4%	-4.2	0.5%	0.1
Rate 40	3.7%	3.5	10.5%	1.4
Rate 41	1.9%	1.8	8.7%	1.1
Rate 55	-1.2%	-1.1	5.1%	0.7
Rate 56 & EV-L	-0.1%	-0.1	5.6%	0.7
Rate 57	-2.2%	-2.1	4.0%	0.5
Rate 58	-1.1%	-1.0	4.7%	0.6
Rate 115	0.4%	0.4	6.1%	0.8
Rate 116 & 117	-5.6%	-5.3	0.6%	0.1
Rate 119	145.0%	137.8	147.2%	19.0
Total	1.05%	1.0	7.74%	1.0

b. Please refer to OCC-729, Attachment 2 CONFIDENTIAL, for the modified ACOS study with the primary distribution portion of FERC accounts 364-368 classified as 100% demand-related. The resulting unit costs are included in tab T.0 Summary Unit Costs.

Below is an illustrative Table 1 for this scenario:

Table 1: Rates of Return at Current and Proposed Rates

	Current Rates		Proposed Rates	
Rate Codes	Rate of Return	Class to Total	Rate of Return	Class to Total
Rate 1 & 7	0.9%	0.9	7.8%	1.0
Rate 5	-0.3%	-0.2	6.8%	0.9
Rate 18	-12.3%	-11.7	1.2%	0.2
Rate 27, 27A, 30, 30A & EV-S	4.2%	4.0	10.8%	1.4
Rate 29	-5.4%	-5.1	0.8%	0.1
Rate 35, 37 & EV-M	1.4%	1.3	7.9%	1.0
Rate 39	-4.4%	-4.2	0.6%	0.1
Rate 40	4.2%	4.0	10.7%	1.4
Rate 41	2.5%	2.3	9.0%	1.2
Rate 55	-1.0%	-0.9	5.4%	0.7
Rate 56 & EV-L	0.3%	0.3	4.2%	0.5
Rate 57	-2.1%	-2.0	4.2%	0.5
Rate 58	-0.8%	-0.8	5.1%	0.7
Rate 115	0.1%	0.1	5.6%	0.7
Rate 116 & 117	-5.7%	-5.4	0.5%	0.1
Rate 119	145.0%	137.8	147.2%	19.0
Total	1.05%	1.0	7.74%	1.0