Date Filed: August 27, 2026

Witness: Douglas P. Horton
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM COST RECOVERY ADJUSTMENT FACTOR - SCRAF) Refer to Exhibit CLP-ELP-1, pp. 136-137. The Company proposed a SCRAF that would include an annual filing of "the actual storm costs incurred for the prior calendar year with all supporting documentation on September 1st." Identify if the Company has, or will have by September 1, 2026, the storm cost information for events through December 31, 2026. If the 2025 information will not be available, explain how the Company could administer the SCRAF as proposed.

Response:

The Company assumes that the question is inquiring about "storm cost information for events through December 31, 202**5**," rather than December 31, 2026.

The Company submitted as many storm events with its initial filing in this docket as it was feasible to complete as part of the rate filing made on July 14, 2026 (i.e., 14 storms occurring over a 15-month period, January 1, 2024 through March 31, 2025). As shown on Exhibit CLP-ACCT-1 (Summary), only two of the 14 storm events submitted on July 14, 2026 for review in this proceeding pertain to the *prior calendar year* and the bulk of the events (12 in total) pertain to the year *prior to the prior calendar year*, which was calendar year 2024.

As shown in EOE-135, Attachment 1, there are four additional storms that occurred in 2025, which took place in July 2025, October 2025 (two) and December 2025, making a total of six storms for calendar year 2025.

On the Company's proposed filing cycle for the SCRAF, the Company would not have had to prepare *any* storms for filing on July 14, 2026. Instead, the Company would have had to prepare only the 2025 storms for review starting on September 1, 2026, which would have been six storm events – not 18 storm events covering two years of time (2024-2025).

In the future, with the backlog of storm events eliminated, the Company's expectation is that it will be feasible to condense the schedule for invoice receipt and review for the regulatory filing and to adhere to the September 1 filing cycle proposed by the Company.