Date Filed: August 27, 2026

Witness: Douglas P. Horton, Leanne M. Landry, and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(2Q-4Q25 CATASTROPHIC STORM EVENTS) Provide a detailed listing of all catastrophic storm events that have occurred since MN25M011 (i.e., March 6, 2025), along with an estimate of each event's total cost. As part of the response, provide each event's total cost broken down by incremental labor, materials, overheads, vehicles, outside vendors, p-card, and employee expense/other (i.e., similar breakdown to the categories presented for major storm events).

Response:

Please refer to EOE-135, Attachment 1, for a list of catastrophic storm events with costs by category that have occurred since March 2025.

Please note that the costs provided in EOE-135, Attachment 1, are preliminary amounts based on the costs recorded to the Company's general ledger as of July 2026, which have not been through the rigorous storm invoicing quality control review process that is described in the testimony of the Storms Panel filed as Exhibit CLP-STORM-1, beginning at page 94. As noted in the Company's response to EOE-132[i], the Company's proposal with regard to storm costs post-March 2025 is to file the actual storm costs incurred from April 2025 through December 2026 that have been fully through the storm invoicing quality control audit process along with all supporting documentation on September 1, 2027.

Prior Referenced Response:

[i] EOE-132 Question:

(CATASTROPHIC STORM CUTOFF) Explain why the Company decided to omit 2Q-4Q 2025 catastrophic storm events from the rate case submission.

EOE-132 Response:

Please refer to the testimony of the Storms Panel filed as Exhibit CLP-STORM-1, beginning at page 94, which discusses the Company's detailed storm invoicing quality control audit process. It can take weeks or months for the Company to receive invoices after a catastrophic storm or pre-staging event. Once an invoice is received, the Company performs its multi-step review process, which also takes weeks or months depending on each invoice's size

and complexity. Because of the delay in receiving, reviewing and approving invoices, it was not feasible to include storms occurring after March 2025 within the Company's initial rate amendment Application.

With regard to costs associated with storm events occurring after March 2025, the Company's plan is to file the storm costs incurred from April 2025 through December 2026 with all supporting documentation on September 1, 2027. Please refer to the Company's response to OCC-143[i], as well as the testimony of the Eversource Leadership Panel in Exhibit CLP-ELP-1, beginning on page 121, for the Company's proposal to establish a new Storm Cost Recovery Adjustment Factor ("SCRAF") that would establish a more programmatic and timely process for review of costs associated with catastrophic storms and pre-staging event costs.

Thus, with respect to storm costs incurred post-March 2025, the Company's plan is to file the actual storm costs incurred from April 2025 through December 2026 with all supporting documentation on September 1, 2027. Pursuant to the Company's proposal in this case, PURA would then conduct a contested proceeding to evaluate the prudence of the incremental catastrophic storm and pre-staging event costs, the accumulated reserve balances and the potential need for a SCRAF rate change to commence recovery of prudently incurred costs. The Company's proposal is to implement any rate changes on September 1st of the following year, aligning with the Company's RAM Phase II rate changes on the same day.

This process would continue on an annual cycle, with the Company filing the prior year's actual storm costs with all supporting documentation on September 1st each year; with a prudence review occurring thereafter; and a potential rate change to incorporate those storm costs into the SCRAF in the following September 1st rate change. This routine cycle would avoid the accumulation of storm costs in a manner that causes rate shock for customers; would mitigate the applicability of carrying costs, lowering costs for customers and would be administratively efficient with smaller increments of storm costs presented for review at any given time.