Date Filed: September 15, 2026

Witness: Jared A. Lawrence and Shamus O'Brien
Request from: Office of Consumer Counsel

Question:

Exhibit CLP-CUSTOMER-1: Customer PIM Suite
(Post Transaction Survey – CSR Attributes) The Company's proposed Post Transaction Survey component measures customer ratings of CSR courtesy, friendliness, knowledge, and concern for customer needs following telephone interactions. The RE02 Customer Satisfaction Scorecard measures customer satisfaction across customer service support, DER interconnection, and service interruptions, including satisfaction with issue resolution and overall interaction quality. Please explain why the Company proposes to attach a positive financial incentive to its Post Transaction Survey measure rather than the customer satisfaction measures developed in RE02. In your response, please explain why performance above the proposed 8.43 target represents exemplary performance warranting a shareholder incentive and identify any analysis demonstrating that improvement in the proposed CSR attributes is associated with improved customer outcomes.

Response:

Including the Post Transaction Survey – CSR Attributes measure within the PIM suite, and allowing for a positive financial incentive, as well as financial penalty, is appropriate because it provides the Company with an additional mechanism to encourage continuous improvement to the quality of customer interactions and reinforce behaviors that contribute to a positive customer experience. The five components of the customer PIM suite collectively reflect different aspects of the Company's service to customers and provide a more comprehensive measure of customer performance as discussed in response to OCC 527[1].

Aside from Level 1 DER interconnection processing metric, the RE02 Proposed Final Decision received on July 27, 2026 did not propose any other PIMS related to customer satisfaction. Combining Post Transaction Survey – CSR Attribute metric with the other four components of the customer PIM suite incorporates the differing aspects of the Company's service to customers.

Further, the proposed Customer PIM Suite, which evaluates customer satisfaction with customer service support and measures DER interconnection performance, complements the System and Customer Reliability PIMs, which measure the frequency and duration of service interruptions and their impact on customer.

Collectively, these PIMs provide a balanced and comprehensive framework for assessing the Company's performance of its delivery of reliable, responsive service to customers.

The target of 8.43 for the Post Transaction Survey – CSR Attributes does not represent the threshold at which the company would earn an incentive. The target represents the level of performance the Company seeks to maintain (equal to 2025 actual). On-target performance in this metric itself doesn't guarantee an incentive, as it would require exemplary above-target performance in the other metrics included in the Composite Index of the Customer PIM Suite.

Customer perception of a customer service representative's courtesy, friendliness, knowledge, and concern for customer needs are strongly correlated with their overall satisfaction with their phone interaction. Correlation measures the degree to which variables are related and tend to change together. A strong correlation is generally indicated by a correlation coefficient close to +1.00 or -1.00. All four customer service representative attributes in question have a correlation coefficient of +0.77 to +0.84, demonstrating a strong correlation. The benefit of utilizing these attributes is that they are all an indication of the Company's success in training customer service representatives to successfully assist customers with their questions or concerns.

Prior Referenced Response:

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[i] OCC-527 Question:

Exhibit CLP-CUSTOMER-1: Customer PIM Suite
(Level 1 DER Interconnection Processing) The RE02 Performance Evaluation System identifies Level 1 DER Interconnection as a standalone potential PIM. The Company instead proposes to include Level 1 DER Interconnection Processing as one of five components of its Customer PIM Suite. Please explain why the Company selected a composite structure rather than the standalone PIM identified in RE02, including how incorporating Level 1 DER Interconnection performance into the Customer PIM Suite is expected to improve interconnection performance.

OCC-527 Response:

The Company selected a composite PIM structure for its customer metrics, including Level 1 DER interconnection processing, because customer experience is multidimensional and more appropriately evaluated through a balanced set of performance measures rather than singularly measuring customer metrics in isolation. The five components of the customer PIM suite collectively reflect different aspects of the Company's service to customers and provide a more comprehensive measure of customer performance. Including Level 1 DER interconnection processing as one component of the composite PIM suite recognizes the importance of timely and effective interconnections processing, while avoiding placing disproportional emphasis on a single customer facing operational measure.

A standalone PIM for Level 1 DER interconnection processing could inadvertently prioritize focus on performance for this metric at the possible expense of other important customer outcomes. The composite structure instead encourages the Company to maintain balanced performance across a full range of customer-focused objectives.

The use of the composite PIM does not diminish the significance of Level 1 DER interconnection processing performance but rather recognizes that it is one of several important dimensions of customer service. The composite

approach provides a more comprehensive performance framework that is less susceptible to unintended consequences for measuring, penalizing and/or rewarding customer performance versus a stand-alone PIM approach.