Date Filed: October 19, 2026

Witness: Douglas P. Horton, Brendan J. O' Brien and Garrett J. Murray
Request from: Office of Consumer Counsel

Question:

Non-catastrophic storm costs. Refer to the response to OCC-701. Provide the inflated and non-inflated annual amounts broken out by non-catastrophic and incremental pre-staging.

Response:

As explained in the Company's response in OCC-940[i], the Company did not include pre-staging storm costs in Schedule C-3.28. Schedule C-3.28 only includes incremental storm expenses from storms that do not qualify as catastrophic or pre-staging.

Please refer to OCC-701, Attachment 1, for inflated and non-inflated non-catastrophic storm costs. Please refer to the Company's response in OCC-674[ii] for the inflated and non-inflated annual pre-staging amounts.

Prior Referenced Response:

[i] OCC-940 Question:

Pre-staging Costs. Refer to Exhibit CLP-REVREQ-1 page 108. Explain how the pre-staging storm costs included in Schedule C-3.28 are incremental to the pre-staging costs in Schedule C-3.27.

OCC-940 Response:

The Company did not include pre-staging storm costs in Schedule C-3.28. Schedule C-3.28 only includes incremental storm expenses from storms that do not qualify as catastrophic or pre-staging.

[ii] OCC-674 Question:

Prestaging Costs. Refer to WP C-3-27. Provide the unescalated actual amounts for each of the years 2021-2025.

OCC-674 Response:

Please refer to the table below for the Company's unescalated pre-staging event costs for each year 2021 through 2025. The amounts reflected are in thousands of dollars. As shown in the table below, the unescalated amounts support additional base rate funding in excess of the currently approved $3 million annually and supports the Company's recommendation of a new base rate pre-staging reserve annual funding amount of $4 million.

Year	2021	2022	2023	2024	2025	5-Year Avg.
Pre-Staging Cost	$3,230	$5,071	$5,289	$0	$3,385	$3,395

Please refer to OCC-674, Attachment 1, Page 1 for the calculation showing how the uninflated amounts were inflated to the Rate Year. Page 2 provides the raw data and information used to derive the applicable inflation factors on OCC-674, Attachment 1, Page 1, line 15.