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Witness: Donald J. Scacco Jr., Digaunto Chatterjee, Douglas P. Horton, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

(Follow-up to ALLCO-053.) The response states that "[p]lant additions and retirements are not forecasted by project at a FERC account level" and answers every remaining subpart "N/A." That position cannot be reconciled with the Company's own filings: on September 15, 2026, the Company filed Exhibit CLP-ADDITIONS-4 Supplemental, whose "2026 Plan Update" tab presents the Company's projected 2026 capital spend PROJECT BY PROJECT — project number, name, projected spend, and a narrative project description — totaling approximately $605 million. State: (a) how the project-level 2026 capital plan in CLP-ADDITIONS-4 Supplemental, was developed and by whom, and produce the equivalent project-level plans for 2027 and 2028 (or the most recent capital budget or five-year plan covering those years, however titled); (b) a reconciliation of the project-level 2026 plan to the January 2026-June 2027 forecasted additions by FERC account on Schedule B-2.2; (c) the answers to subparts (b) through (e) of ALLCO-053, none of which depends on the premise the response rejected: subpart (c) asks where AMI capital is reflected — a question about the Company's own schedules; subpart (d) asks for the fleet plan supporting approximately $76 million of forecasted transportation additions including $47.9 million of Class 4 heavy trucks; and subpart (e) asks whether documented business cases exist for projects exceeding $25 million — answer each, or state affirmatively that no fleet plan and no business-case analyses exist; and (d) if the Company maintains that its $1.51 billion of forecasted additions is supported only by "historical precedent and anticipated projects," identify every document in which the "anticipated projects" are listed.

Response:

a. Capital investment forecasts are developed as part of annual financial planning efforts that span organizations across the Company. It is not practical nor relevant to determine each individual that may have contributed thoughts or expertise that gave rise to the capital projections ultimately determined and subsequently filed in this proceeding. As with most planning processes, models, and efforts, planning assumptions that have a longer time horizon have different supporting documentation and specificity than planning assumptions that are closer in time. In the present circumstance, financial planning for the near future, which is informed by more developed project scopes, engineering assessments, asset condition information, resource plans, known business requirements, and a clearer understanding of expected operational circumstances, can and does yield more detail than capital expenditure projections further out in time. Such operational circumstances include anticipated asset

replacement needs, system reliability considerations, customer growth and interconnection activity, regulatory and compliance requirements, workforce circumstances and other system conditions that become increasingly difficult to predict with precision over longer planning horizons.

b. As previously stated, plant additions and retirements are not forecasted by project at a FERC account level. The 2026 Plan Update provided is at a project level but does not forecast at the FERC account level presented as part of Schedule B-2.2. The Company is currently engaged in its 2027 Annual Planning Process.

c. Please see the following:

- AMI capital is not currently reflected within the Company's rate base. The Company has proposed to PURA in this proceeding how its PBMRP proposal can be adjusted to accommodate AMI capital investments in the future.

- The fleet plan is not forecasted at the vehicle class level.

- All capital projects are reviewed in accordance with the Project Authorization Policy (PAP) which is provided in Exhibit-CLP-ADDITIONS-10A, 10B, and 10C. All associated capital additions documentation is summarized in Exhibit-CLP-ADDITIONS-4, and provided in Exhibit-CLP-ADDITIONS-6.

d. FERC plant accounts and capital projects represent two different ways of organizing the same underlying investment. Capital projects are typically organized around a specific business objective, scope of work, geographic area, program, or asset installation effort, such as a substation expansion, feeder rebuild, pole replacement program, among others. In contrast, once those projects are placed into service, the associated costs are disaggregated and classified into FERC plant accounts based on the nature and function of the assets constructed, such as poles, conductors, transformers, station equipment, buildings, or communication equipment. Accordingly, a single capital project may contribute costs to multiple FERC plant accounts, while a single FERC plant account will typically contain investments originating from hundreds or thousands of different capital projects accumulated over time.

With respect to financial forecasting, the Company does not generally attempt to identify the component assets resulting from its capital program. Rather, it focuses on the objectives, scope, and execution of its projects and programs. Consequently, it is perfectly reasonable that the Company can produce capital projections that are aimed at realizing those objectives, are feasible, and can be executed, without focusing on the resulting FERC asset classifications. In the present docket, detail of the Company's capital expenditure can be found in the Company's TSP discussion.

For revenue requirement calculation purposes, which, from a capital investment standpoint, relies upon plant placed into service, the Company relies on experience and historical trends to establish reasonable estimates of the timing those investments will be placed into service as well as the resulting underlying asset classifications. For example, historical Emergent Failure capital projects may be placed in-service nearly concurrently with the spend itself, and close to a combination of asset classifications, such as lines, poles, small tools, etc. To the extent the Company anticipates a similar volume and severity of future Emergent Failure capital investments, the Company may assume that future capital investment follows a similar pattern with respect to timing and asset classifications.