Date Filed: October 06, 2026

**Witness: Brendan J. O'Brien and Garrett J. Murray**
**Request from: Office of Consumer Counsel**

**Question:**

Uncollectibles. Refer to WP C-3.30.

a. Explain why the uncollectible expense is calculated including the revenues and uncollectibles for the RAMs and not just distribution revenues.
b. Update the schedule to provide the information on a distribution only basis.
c. Identify each RAM that recovers uncollectible expense.

**Response:**

a. The uncollectible expense in schedule WP C-3.30 reflects only bad-debt cost on customer rates that is not collected in other recovery mechanisms. The only portion of non-hardship bad debt cost that is recovered in other mechanisms is the uncollectible costs on GSC energy supply revenues that are recovered in FMCC rates. Non-hardship bad debt incurred on all other rate revenues, including all RAM components, is recovered in distribution rates consistent with prior rate case proceedings.[1]

b. As outlined above, the Company separately tracks non-hardship uncollectible costs on the GSC energy supply portion of customer bills, which is recovered in FMCC rates. As a result, the total non-hardship uncollectible expense reflected within WP C-3.30 represents the total non-hardship distribution or delivery uncollectible expense.

c. The Company recovers GSC non-hardship uncollectible costs in the FMCC and hardship uncollectible costs within the System Benefits Charge ("SBC"). These costs are not included in schedule WP C-3.30 and are segregated from the uncollectible costs described above. Distribution rates are designed to collect non-hardship customer uncollectibles only (excluding GSC energy supply revenues). Lastly, please refer to Footnote 1 in this response for additional information regarding the roll in of uncollectible costs previously recovered in RAM rates.

[1] Note, there are currently incremental revenue requirements on certain capital recoveries within the System Benefits Charge ("SBC") and Non-Bypassable Federally Mandated Congestion Charges ("NBFMCC") that include limited non-hardship uncollectible expense calculations that are incremental to what is included in current base distribution rates. The Company's proposal is to roll those capital recoveries into base distribution rates and therefore the associated uncollectible expense will also be rolled into base distribution rates.