Date Filed: September 18, 2026

Witness: Donald J. Scacco Jr., Digaunto Chatterjee and Douglas P. Horton
Request from: ALLCO

Question:

With respect to the forecasted plant additions and retirements reported by FERC account on Schedule B-2.2 of Exhibit CLP-REVREQ-2 for the periods January 1, 2026 through June 30, 2027 and July 1, 2027 through June 30, 2028: (a) provide, in native (Excel) format, a project-level itemization of the forecasted additions in each period for each FERC account ─ at minimum for Account 362 (Station Equipment: $181,989 thousand and $147,907 thousand), Account 365 (Overhead Conductors and Devices: $154,720 thousand and $122,938 thousand), Account 367 (Underground Conductors and Devices), Account 364 (Poles, Towers and Equipment), and every other account whose forecasted additions exceed $10 million in either period ─ showing for each project the project name or work-order identifier, description, forecasted cost by period, forecasted in-service date, and the driver category (e.g., load growth, asset condition, reliability, storm hardening, interconnection, AMI, fleet); (b) identify each project in subpart (a) that increases substation or circuit capacity or hosting capacity, stating the substation or circuit affected and whether any pending distribution interconnection application would be enabled by it; (c) state where the capital costs of the advanced metering infrastructure program are reflected ─ identifying the amounts, if any, included in the Schedule B-2.2 additions, the amounts proposed for recovery through the F-Factor or any other mechanism, and the schedule or workpaper where each appears ─ given that Account 370 (Meters) additions total only $45.8 million across both periods; (d) for the transportation and power-operated equipment accounts (392-series and 396), which reflect forecasted additions of approximately $76 million including $47.9 million of Class 4 heavy trucks against a $112.9 million test-year balance, produce the fleet plan, replacement schedule, or other analysis supporting the forecasted additions, and state the number of units to be acquired by vehicle class and the assumed cost per unit; and (e) state whether each project or category identified in subpart (a) was subjected to a documented business-case or cost-benefit analysis before inclusion in the forecast, and produce each such analysis for projects exceeding $25 million.

Response:

(a) Plant additions and retirements are not forecasted by project at a FERC account level. Forecasts are developed using historical precedent and anticipated projects. Plant addition forecasts are developed by relying on forecasted capital expenditures and recent historical trends of plant in service in relation to capital expenditures, as well as any project-specific information (if available) to develop reasonable estimates of the forecasted plant additions relied upon in this proceeding.

(b) N/A based on the response to subpart (a), above.

(c) N/A based on the response to subpart (a), above.

(d) N/A based on the response to subpart (a), above.

(e) N/A based on the response to subpart (a), above.