Date Filed: September 22, 2026

Witness: Julia Frayer
Request from: Office of Consumer Counsel

Question:

Please provide, for each EDC and each year included in LEI's Industry TFP Study and Benchmarking Study, all data and calculations used to determine the portion of A&G expense attributed to electric distribution operations, including:

a. Total reported A&G expense;
b. Total plant in service;
c. Electric distribution plant in service;
d. The resulting distribution plant share used to allocate A&G expense; and
e. The resulting amount of A&G expense included in OM&A for purposes of the TFP and benchmarking analyses.
f. Please provide the underlying data, sources, and calculations in an unlocked Excel workbook with formulas intact.

Response:

Please refer to OCC-563, Attachment 1, which provides the requested data for each EDC and year: the total reported A&G expense, total plant in service, electric distribution plant in service, the resulting distribution plant share, and the amount of A&G allocated to electric distribution operations. As described in Section 3.2 of Exhibit CLP-PBR-2, LEI calculated each utility's annual distribution plant share as electric distribution plant in service divided by total plant in service. LEI then applied that percentage to the utility's total reported A&G expense for the same year to estimate the portion of A&G attributable to electric distribution operations. The resulting allocated A&G expense was added to annual O&M expense to derive OM&A used in the Industry TFP Study and Benchmarking Study.