Date Filed: September 15, 2026

Witness: Warren R. Boutin and Andrew C. Belden
Request from: Office of Consumer Counsel

Question:

Exhibit CLP-CUSTOMER-1: Customer PIM Suite
(Level 1 DER Interconnection Processing) The RE02 Performance Evaluation System identifies Level 1 DER Interconnection as a standalone potential PIM. The Company instead proposes to include Level 1 DER Interconnection Processing as one of five components of its Customer PIM Suite. Please explain why the Company selected a composite structure rather than the standalone PIM identified in RE02, including how incorporating Level 1 DER Interconnection performance into the Customer PIM Suite is expected to improve interconnection performance.

Response:

The Company selected a composite PIM structure for its customer metrics, including Level 1 DER Interconnection Processing, because customer experience is multidimensional and more appropriately evaluated through a balanced set of performance measures rather than singularly measuring customer metrics in isolation. The five components of the customer PIM suite collectively reflect different aspects of the Company's service to customers and provide a more comprehensive measure of customer performance. Including Level 1 DER Interconnection Processing as one component of the composite PIM suite recognizes the importance of timely and effective interconnections processing, while avoiding placing disproportional emphasis on a single customer facing operational measure.

A standalone PIM for Level 1 DER Interconnection Processing could inadvertently prioritize focus on performance for this metric at the possible expense of other important customer outcomes. The composite structure instead encourages the Company to maintain balanced performance across a full range of customer-focused objectives.

The use of the composite PIM does not diminish the significance of Level 1 DER Interconnection Processing performance but rather recognizes that it is one of several important dimensions of customer service. The composite approach provides a more comprehensive performance framework that is less susceptible to unintended consequences for measuring, penalizing and/or rewarding customer performance versus a stand-alone PIM approach.