Date Filed: August 31, 2026

Witness: Jared A. Lawrence
Request from: Office of Consumer Counsel

Question:

Identify each AMI cost category that is necessary for core meter deployment versus optional, timing-flexible, or benefit-enhancing functions such as VVO, customer portal, analytics, load settlement, and Green Button Connect.

Response:

The Company has grouped the AMI cost categories based on whether the associated costs are necessary to support the deployment, integration, security, and ongoing operation of the core AMI platform, or whether the costs primarily support supplemental capabilities, incremental benefits, or functionality that can be implemented on a different timetable.

The table below identifies each AMI cost category and the Company's classification of each cost category:

AMI Cost Category	**Classification**
Meters	Necessary
Undepreciated Meter Balance	Necessary
Communications Upgrades	Necessary
Meter Data Management System (MDMS)	Necessary
Customer Information System (CIS)	Necessary
Organizational Readiness	Necessary
Contact Center	Necessary
Incremental Labor	Necessary
Outage Management System (OMS) Integration	Optional/Timing-Flexible/Benefit Enhancing
Customer Experience Portal	Optional/Timing-Flexible/Benefit Enhancing
VVO Enablement	Optional/Timing-Flexible/Benefit Enhancing
Engineering and Customer Usage Analytics	Optional/Timing-Flexible/Benefit Enhancing
Customer Engagement	Optional/Timing-Flexible/Benefit Enhancing
Cybersecurity	Necessary
Revenue Assurance (Non-Technical Line Loss)	Optional/Timing-Flexible/Benefit Enhancing
Data Storage and Processing	Necessary
Green Button Connect	Optional/Timing-Flexible/Benefit Enhancing
Load Settlement	Optional/Timing-Flexible/Benefit Enhancing