GenConn Energy LLC **Witness: Devang Patel**

Docket No. 26-06-02 **Page 1 of 2**

Date Submitted: August 3, 2026

RRU-001 Q:

(O&M) Application. GenConn-02 (Settlement), Tab: Ex. 7 - Consolidated. Excel column M provides the 2025 actuals (Test Year Basis) by the accounts/categories listed in Excel column B. In an unlocked Excel worksheet with formulas intact, provide the corresponding information by accounts/categories for each year from 2021 through 2025. For any year over year variance greater than 5% (plus or minus), provide a detailed explanation for the variance.

RRU-001 A:

The Company notes that this interrogatory cites to GenConn-02 (Settlement). For clarity, the Company's proposed revenue requirement in this case is contained in Attachment GenConn-02. In contrast, GenConn-02 (Settlement) was provided for illustrative purposes only (Attachment GenConn-01, at iii n. 5, 5, 9-10, 19, n. 11).

Consistent with the methodology approved by PURA, Fixed O&M, as presented in Exhibit 7 – Consolidated, is the sum of O&M activity relating to each individual GenConn Plant (i.e., GenConn Devon and GenConn Middletown). PURA directed in Docket No. 12-07-14, Application of GenConn Energy LLC for Establishment of 2013 Revenue Requirements ("2013 Decision") that:

> [i]f the cap amount calculated [the 2008 original proposal line items in Attachment 6 - Operating Cost Summary as escalated from 2009 through 2027 using actual annual inflation to the extent available] is greater than the inflation adjusted actual calculation [the previous year's actual expenditures per line item as presented in Attachment 6 - Operating Cost Summary], no further analysis is required.

In contrast:

> [i]f the cap amount calculated [the 2008 original proposal line items in Attachment 6 - Operating Cost Summary as escalated from 2009 through 2026 using actual annual inflation to the extent available] is less than the inflation adjusted actual calculation [the previous year's actual expenditures per line item as presented in Attachment 6 - Operating Cost Summary], **the amount above the cap amount requires examination for prudency**.

(see 2013 Decision, at 4). The instant filing establishing the Company's Annual Fixed Revenue Requirement for the 2027 rate year represent the first year, over the course of GenConn's history, that test year actuals correspond to values that when escalated will be greater than the 2008 escalated values.

Please refer to RRU-001 Attachment 1 for the requested information. Please also note the following:

1) Each year actual values are provided for 2021 through 2025 and associated variance analysis as requested.

2) Variances associated with certain line items, year over year on an actual's basis, is not expected to directly correspond to one another due to the fact that operations and maintenance activity can differ (for example, non-recurring and/or one-time items, carry over projects from one year to the next) based on specific needs of each plant site and additional needs over time.

3) The Company provides, in its annual AFRR filing, information associated with projects that were non-recurring and driven either by new requirements and/or due to items that were not previously anticipated nor included in the 2008 starting point of Fixed O&M values.

4) Variances are associated generally with (1) Commercial Operations (Comm-Ops) and Energy Management Services Agreements ("EMSA") which are by contract escalated each year, (2) non-recurring and one-time maintenance items that are required and (3) and changes in cost categories as part of normal business operations.