

**GREEN MOUNTAIN POWER
MULTI-YEAR REGULATION PLAN
October 1, 2022**

**Amended March 30, 2023 (per March 30, 2023 Final Order in Case No. 23-0141-PET)
and November 18, 2024 (per October 18, 2024 Order in Case No. 23-3501-PET)**

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This Plan constitutes a form of regulation for Green Mountain Power (“GMP” or the “Company”) under 30 V.S.A. § 218d. The Plan governs the manner in which the electric rates of GMP will be regulated by the Public Utility Commission (the “PUC” or “Commission”) during the term of the Plan, and a record of filings of all adjustments occurring out of this Plan shall be filed as a compliance tariff.

I. TERM

The Plan shall take effect on September 1, 2022 for rates effective October 1, 2022 and shall terminate on September 30, 2026. The Plan shall be divided for reference herein into the following rate periods:

FY23	October 1, 2022–September 30, 2023
FY24	October 1, 2023–September 30, 2024
FY25	October 1, 2024–September 30, 2025
FY26	October 1, 2025–September 30, 2026

Rates incorporating adjustments allowed under this Plan shall continue beyond the termination date, as provided in Section VI(D) below. Recognizing the Department’s perspective regarding the length of the Plan, GMP shall report on November 30, 2024 on the benefit of continuing the Plan for the fourth year. The Plan may be terminated or modified upon request of the Company and/or the Department of Public Service (“DPS” or “Department”) and subject to approval by the Commission. Unless otherwise ordered by the Commission, GMP shall file a cost-of-service rate case prior to the termination of the Plan to cover rates for the fiscal year following the termination of the Plan.

II. SUMMARY OF MULTI-YEAR REGULATION PLAN COMPONENTS

The proposed Plan consists of several components, which together are designed to address each of the specific elements of GMP’s overall cost of service. These include components that will be fixed for the term of the Plan based on a reviewed forecast at the beginning of the Plan; components that are adjusted year to year based on a formula; and components where costs and revenues will be reforecast annually and then adjusted to collect or return actual costs and revenues in each fiscal year. The specific treatment of each aspect of the

company's cost of service and rate base are identified in **Attachments 1(a), 1(b) & 1(c)**, which describes whether the component will be fixed at the outset of the Plan, forecasted and adjusted annually, or based upon a formula or calculation performed annually.

One of the goals of the Plan is to develop a smooth rate path for GMP's customers over the term of the Plan. This will be accomplished by:

- (1) Setting a base rate for the first year of the Plan, FY23, after a cost of service review;
- (2) Developing an Initial Projected Smoothed Base Rate change after FY23;
- (3) Locking certain non-power costs for the term of the Plan;
- (4) Adjusting annual base rates after FY23 only to incorporate changes in such items as certain O&M costs, power supply costs, revenue, income taxes, changes in cost of capital, and other specific adjustments approved by the PUC under this Plan;
- (5) Providing an option to further smooth annual rate adjustments, as described in Section V of this Plan;
- (6) Continuing the netting of the Revenue, Power Supply and Major Storm Adjustor and only implement collection/return of the netted adjustment when the direction of collection/return goes in the same direction two quarters in a row and is at least \$1M, which has proven to be an efficient mechanism to smooth the collection/return of these adjustments; and
- (7) Incorporating a Major Storm Restoration Fund as described in Section VI of the Plan, to offset costs.

The Plan also supports continued innovation and performance by GMP for customers through provisions for Innovative Pilots and reporting metrics to support service quality, resiliency, energy supply, and load control goals, among others.

III. PROCESS FOR ESTABLISHING ANNUAL BASE RATES

A. FY23 and Initial Forecasted FY24 to FY26 Base Rate Changes

The FY23 base rate change shall be reviewed and established as approved in GMP's FY23 Rate Case.

During the FY23 Rate Case, GMP will file its initial forecasts of the FY24 to FY26 base rate changes (“Initial Forecasts”) which will set for the term of the Plan many of the FY24 to FY26 cost of service and rate base components in accordance with **Attachments 1(a), 1(b) & 1(c)**. The FY24 to FY26 Initial Projected Smoothed Base Rate change will be provided on June 1, 2023, when GMP files its FY24 to 26 updated forecasts (“Updated Forecasts”) prepared in accordance with **Attachments 1(a), 1(b) & 1(c)**, as part of its FY24 annual base rate filing, using the rate smoothing methodology set out in Section V, below.

B. Timing for Annual Base Rate Filing (FY24, FY25, FY26)

Subsequent base rate filings shall be made on June 1 of each year (starting June 1, 2023) and include the expected base rate adjustments for the following year of the Plan, based on any annual adjustments authorized under the Plan and application of the Rate-Smoothing Adjustment discussed more fully in Section V below. These Annual Base Rate Filings shall be accompanied by a narrative explanation of information reasonably needed to assist in understanding the filing.

C. Notice

The Annual Base Rate Filing shall be posted on the Company website at the time of filing, and the Company shall provide individual customer notice through bill notification of each Plan period’s Base Rate Annual Adjustment when its request to effectuate those changes is filed.

D. Review and Approval

The Commission’s Order in the FY23 Rate Case shall set the FY23 Base Rate. The proposed Annual Base Rate filings thereafter shall be subject to DPS review and comment (including independent expert review, as needed), and PUC approval. The Department shall file comments on the Company’s Annual Base Rate Filings within 60 days of the filing. Final rates for the coming fiscal year shall be set by the PUC no less than 30 days prior to the start of the fiscal year.

E. Schedule for Filings

The schedule for all required filings under this Plan is outlined in **Attachment 8**, including the Annual Base Rate filings discussed in this section, Adjustor filings discussed in Section VI, and the Innovation and Performance Metrics discussed in Section VIII(D).

IV. COMPONENTS OF ANNUAL FY24 TO FY26 BASE RATES

GMP's FY24 to FY26 base rate changes shall consist of certain locked non-power cost components, plus forecasted non-power cost components, and forecasted power supply, revenue and income tax components. As set forth below, some cost components will be refreshed annually based on updated forecasts. The forecasted rates will also incorporate a return on equity component, which will be adjusted annually based on an ROE formula set in the Plan.

On June 1, 2023, GMP will file an Initial Projected Smoothed FY 24 to FY26 Base Rate change and will use the Initial Rate-Smoothing Mechanism set forth in Section V to smooth out anticipated variation in rates during the remaining term of the Plan.

The Forecasted FY24 – FY26 base rate changes will consist of:

- (1) Non-power cost forecast for FY24, FY25, & FY26;
- (2) Power supply & revenue forecast for FY24, FY25, & FY26;
- (3) Cost of debt for FY24, FY25, & FY26
- (4) Income tax, ADIT forecast for FY24, FY25 & FY26; plus
- (5) 3-year estimated ROE.

The treatment of all cost categories year to year (e.g., fixed, forecasted, or annually adjusted) is set forth in **Attachments 1(a), 1(b), and 1(c)**.

Annual Base Rate filings for FY25 and FY26 will adjust the Initial Projected Smoothed Base Rates filed with the FY24 Rate Case to account for annual adjustments authorized under the Plan. The FY24, FY25 and FY26 Annual Base Rate filings will refresh certain

non-power costs, the power supply & revenue forecasts, income taxes & ADIT, and the adjustment for ROE provided by the formula established in the Plan, plus any other changes authorized by the PUC under the specific provisions of this Plan. These adjustments to the Initial Projected Smoothed Base Rate may be further smoothed as described in Section V below to result in the annual base rate change for FY25 and FY26 filed with the Commission each June and subject to review by the Department and approval by the Commission.

In setting the proposed Annual Base Rates for each fiscal year, the components of GMP's cost of service shall be established as follows, consistent with **Attachments 1(a), 1(b), and 1(c)**:

A. Non-Power Costs (Forecast & Fixed)

1. *Infrastructure Costs (Capital Expenditures, Depreciation, Property Taxes)*

i. Capital Expenditures

- a. Overall base capital expenditures that are closed to Plant In Service during each fiscal year of the Plan is expected to be equal to the following amounts:

FY23 \$131 million;
FY24 \$115 million;
FY25 \$115 million;
FY26 \$115 million.

These amounts will include GMP's anticipated Plant Additions during each fiscal year, including climate resiliency work similar to work described in the Climate Plan approved by the Commission in Case No. 20-0276-PET, ongoing new initiatives capital projects, and forecasted amounts for GMP's anticipated capital spending for customer battery storage such as through an extension of the Energy Storage System ("ESS") program. These amounts will remain fixed in rates unless supplemented with approved new initiative tariff plant additions (see Section IV(A)(1)(iv)), approved Unexpected Circumstances and Strategic

Opportunities plant additions (see Section IV(A)(6)), Cybersecurity plant additions (Sections IV(A)(7)), any annual broadband deployment work as approved by the Commission in Case No. 21-0544-TF or otherwise allowed in support of the State’s broadband deployment goals during the term of the Plan.

The actual annual plant additions will vary from year to year based upon the timing of capital project completions and the closing of projects from the Construction Work in Progress balance to the Plant in Service balance, but GMP shall be held to cumulative plant additions during the term of the Plan not to exceed the total of the annual approved capital expenditure amounts.

Zero Outage Initiative (“ZOI”) Costs: In addition to the base capital expenditures set forth above, GMP may invest up to \$150M for plant additions, related expenses, and incremental ZOI O&M for projects closed from the date of the ZOI approval order in Case No. 23-3501-PET, October 18, 2024, through the end of the Plan,¹ accounting for and recovering expenses for these investments using the regulatory accounting and rate treatment set forth in **Attachment 10**.

ii. Depreciation Costs

Depreciation costs shall be fixed for the term of the Plan based on the projected plant in service balance at the beginning of the Plan, the expected annual plant additions, and known retirements. This forecast may only be adjusted to reflect any allowed capital expenditures approved by the PUC year to year as discussed in Section IV(A)(1)(i) above. GMP will perform an updated depreciation study in FY25, which will be reviewed and incorporated into future rates or regulation plans as approved by the Commission.

¹ Consistent with the ZOI approval order, “ZOI work will be primarily focused on the EJ-G7 and 56G1 circuits and upgrades to the circuits included on GMP’s ‘20 least reliable circuits’ list.” Final Order in Case No. 23-3501-PET at 24.

iii. Property Taxes

Property taxes are fixed based on the Initial Forecasts of expected property taxes, taking into account the fixed capital expenditures identified above. This forecast may only be adjusted to reflect any allowed capital expenditures approved by the PUC year to year as discussed in Section IV(A)(1)(i) above.

iv. New Initiative Tariffed Offerings

Capital costs associated with tariffed offerings for New Initiative Programs approved by the Commission during the term of the Plan will be added to the total approved plant additions under the Plan.² Any proposed tariffs for New Initiative Programs will be subject to the usual review and approval process for tariffs under 30 V.S.A §§ 225, 226, & 227, including that they will result in just and reasonable rates. During the term of the Plan, GMP will not seek to recover through rates the cost-of-service impacts of New Initiative capital projects until after the capital project is complete and recorded to plant in service. GMP will separately track and record to a regulatory asset the incremental cost-of-service impacts (return, accumulated deferred income taxes, depreciation expense, property taxes, and O&M costs, offset by incremental other operating revenue) from the time the New Initiative capital project is placed in service until the New Initiative capital project cost-of-service impacts are reflected in base rates.

GMP will accrue a return on the regulatory asset based on GMP's weighted average cost of capital, excluding the deferred debt and equity components of the regulatory asset, but defer collection until the Commission specifically approves including the New Initiative capital project in base rates. The regulatory asset will be included in a future Annual Base Rate filing, or the follow-on rate case for the fiscal year following the termination of the Plan.

² See e.g. Case No. 24-1715-PET, Final Order of Sept. 10, 2024 approving up to \$15M in capital investments under GMP's Energy Storage System (ESS) Tariff.

2. *Operations & Maintenance Costs*

Operating and Maintenance costs are the Other Power Supply, Transmission – Other, Distribution, Customer Accounting, Customer Service and Information, Sales and Administrative, and General Categories of the cost of service. A variety of cost types (e.g., payroll and benefits, Digsafe underground protection, non-major storm costs, and various types of outside services, consumables, etc.) make up these cost categories. GMP has the ability to exert various levels of control over certain of these cost types and very limited or no control over other cost types. Cost types that GMP has a level of control over will either be fixed or adjusted for inflation based upon an external, publicly available index (only the inflation rate is adjusted to reflect more current inflation rates), and cost types GMP has little or no control over will be reforecasted annually based on updated actuarial reports, consultant reports, or GMP known and measurable bid or other cost information. **Attachment 1(c)** summarizes how these O&M costs will be calculated for FY24, FY25, and FY26.

3. Financing Costs (Debt)

i. Debt Costs

GMP's debt level shall be fixed based on a forecast of anticipated debt balances for each fiscal year of the Plan. The FY23 cost of debt will be set in the FY23 Rate Case while the FY24 to FY26 cost will fixed based on the Updated Forecasts for base rates submitted June 1, 2023 for FY24 base rates. These estimated debt costs will be subject to any changes in debt levels necessitated by the PUC's approval of additional expenditures under the terms of this Plan, which will be incorporated in the next Annual Base Rate update.

ii. Debt to Equity Ratio

GMP shall utilize a 50/50 debt to equity ratio plus or minus 1% in all forecasting under the Plan and shall also endeavor to adhere to that ratio in its operations.

To the extent its actual operating ratio differs, GMP shall be subject to the Earnings Sharing Mechanism described below.

4. Earnings in Affiliates

VT Transco investments and equity in earnings and distributions associated with such investments will be updated annually. All other equity-in-earnings, continued investments in, and distribution of earnings, will be fixed based on a Plan period forecast for the following Affiliated Companies that are currently in rates:

- Vermont Yankee Nuclear Power Corporation;
- Maine Yankee, Connecticut Yankee, and Yankee Atomic;
- Green Lantern;
- NE Hydro Trans and NE Hydro Trans Electric;
- VELCO; and
- JV Solar-Storage.

Any proposal to invest in new affiliates during the term of the Plan will require specific PUC approval. The request for approval will include a summary of the cost-of-service impacts and/or benefits of the proposed new affiliate investment.

5. Other Costs & Revenues

Categories of non-power costs and non-retail revenues not addressed in Sections IV(A)(1–4) shall be set for the term of the Plan based on the reviewed forecast of those costs and revenues, as set forth in **Attachment 1(a)**.

6. Unexpected Circumstances and Strategic Opportunities

Notwithstanding the other provisions of this Plan, GMP may petition the PUC for approval at any time during the Plan for incremental plant in service additions, expenses and revenue to be included in rates when either unexpected circumstances or new strategic opportunities arise that provide material benefit to customers.

Strategic opportunities here may include, but are not limited to, categories of investments that provide new opportunities to increase the resiliency of the

distribution system or help to better monitor, manage, and operate the distribution system for more effective integration of distributed energy systems and loads that were not reasonably anticipated at the onset of the Plan. These opportunities help to advance GMP's objectives of lower-cost service to customers and increased integration of distributed energy resources.

In its petition for relief, GMP will bear the burden of demonstrating that the proposed investments, expenses, and revenue for unexpected circumstances or new strategic opportunities are in customers' best interests and will result in just and reasonable rates in the long run. Base rates may be adjusted at the next quarter after any approval under this provision, or at the next Annual Base Rate filing, unless otherwise ordered by the Commission.

7. Cybersecurity Plan

GMP will include presently expected IT and cybersecurity investments in its forecasts for the Plan period. In light of rapidly evolving standards and expanding reach of connected resources, and notwithstanding the other provisions of this Plan, GMP may file a Cybersecurity Plan during the term of the Plan proposing additional capital expenditures and/or operational and maintenance expenses for cybersecurity investments. Any such Cybersecurity Plan shall explain why it is in customers' best interest and will result in just and reasonable rates; shall set forth the proposed accounting treatment of any capital costs and expenses associated with the Cybersecurity Plan and the amount of any proposed base rate adjustments; and shall be subject to Commission review and approval.

B. Power Supply Cost and Retail Revenue (Forecasted and Updated Annually)

GMP's annual forecast of retail revenue and power costs shall be established using the following methodology: annually a third-party vendor (Itron, Inc., or a similar outside consultant with expertise in the field of energy forecasting both throughout the country and within Vermont) will provide GMP with a weather-normalized retail revenue forecast and GMP will prepare a power supply forecast based upon the provided retail

revenue forecast. The revenue forecast will take into account such factors as historical data, projections about economic growth and efficiency improvements, company tariffs, impacts on retail revenue due to greater solar net-metering, and any other known changes for the upcoming year. The power supply forecast will include expected expenses associated with serving the retail revenue load, including costs and wholesale market revenues related to energy, capacity, transmission, ancillary services, renewable energy credits, and Renewable Energy Standard compliance. These forecasted net expenses will reflect both GMP's production and purchased contract costs, along with interchanges with the wholesale power market. To facilitate the Department's review, GMP shall provide to the Department of Public Service the retail revenue forecast and the power supply forecast promptly upon completion and at least 30 days prior to GMP's Annual Base Rate filing date.

C. Income Taxes & Related Costs (Forecasted and Updated Annually)

GMP will annually forecast State and Federal Income Taxes, ADIT, and Gross Revenue & Fuel Gross Receipt Taxes based on the other authorized adjustments in overall income or power costs. The forecast of these costs will be updated annually and filed with the Annual Base Rate Filing.

D. Financing Costs – Return On Equity (Annual Update Based on Formula)

GMP's return on equity will be updated annually based on the formula established in this Plan. In FY24, GMP's ROE shall be indexed from the ROE approved in the FY23 Rate Case. In each ensuing year, indexing shall occur from the ROE in effect for the current year. The indexing shall be consistent with **Attachment 3**. Calculations showing the appropriate adjustment will be filed annually with the Annual Base Rate Filing.

V. RATE-SMOOTHING MECHANISM

The Plan contains an Initial Rate-Smoothing Mechanism applied to FY24 to FY26 and an option for additional smoothing in FY25–FY26 if proposed by GMP and approved by the

Commission. The Initial Rate-Smoothing Mechanism is set on June 1, 2023 with the filing of the Updated Forecasts. The Initial Rate-Smoothing Mechanism establishes an annual amount that is either added to or subtracted from the revenue requirement for FY24 to FY26, to set an Initial Projected Smoothed Base Rate path. The Initial Projected Smoothed Base Rate will set the FY24 base rate and will represent the projected average annual base rate change for each subsequent fiscal year in the Plan based on current forecasted revenue requirements and a uniform projected annual base rate change for FY24 to FY26.

A regulatory asset or liability will be established based on the Initial Rate-Smoothing Mechanism in FY24 to account for any adjustments to the forecasted costs or revenues in each fiscal year that are necessary to establish the Initial Projected Smoothed Rate. The regulatory asset or liability will reverse over FY25 and FY26 and will be zero at the end of the Plan.

In FY25 and FY26, GMP will have the option of proposing additional rate smoothing of the difference between a fiscal year's actual base rate change and its Initial Projected Smoothed Base Rate Change, where such smoothing would benefit customers by minimizing rate variation over the term of the Plan. GMP will propose any smoothing in the Annual Base Rate filing for each fiscal year, which is subject to Commission review and approval.

VI. DESCRIPTION OF RATE ADJUSTORS, FILING PERIODS, AND EFFECTIVE DATES

The following rate adjustors, filing periods, and effective dates shall be applied during the term of the Plan.

A. Retail Revenue Adjustor & Power Supply Adjustor

1. Retail Revenue Adjustor

The Retail Revenue Adjustor shall collect or return to customers, on a bills-rendered basis as described below, the difference between the actual retail revenue

every Measurement Quarter and the forecasted retail revenue amount included in base rates for that quarter (the “Quarterly Retail Revenue Variance Amount”). The measurement periods and filing dates are as follows:

Retail Revenue Adjustor			30 Day Review Period End Date
	Measurement Period	Filing Date	
FY 2023 - 2026			
Q1	Oct 1 -- Dec 31	Jan 30	Mar 1
Q2	Jan 1 -- Mar 31	Apr 30	May 30
Q3	Apr 1 -- Jun 30	Jul 30	Aug 30
Q4	Jul 1 -- Sept 30	Oct 30	Nov 30

2. Power Supply Adjustor

The Power Supply Adjustor shall collect or return to customers, on a bills-rendered basis as described below, the difference between the actual power supply costs every Measurement Quarter and the forecasted power supply costs included in base rates for that quarter, as adjusted by the Power Supply Efficiency Calculation set forth below. The resulting figure is the “Quarterly Power Supply Variance Amount.” The measurement periods and filing dates are as follows:

Power Supply Adjustor			30 Day Review Period End Date
	Measurement Period	Filing Date	
FY 2023 - 2026			
Q1	Oct 1 -- Dec 31	Jan 30	Mar 1
Q2	Jan 1 -- Mar 31	Apr 30	May 30
Q3	Apr 1 -- Jun 30	Jul 30	Aug 30
Q4	Jul 1 -- Sept 30	Oct 30	Nov 30

The Power Supply Adjustor Calculation shall be made as follows:

i. Component A Quarterly Variance

The Component A Quarterly Variance for each Measurement Quarter is the dollar amount of any variation between (a) actual Component A Costs for the Measurement Quarter and (b) the Component A Costs included in the Company's base rates for the corresponding quarter, and shall be summed with the Component B Quarterly Variance described below.

ii. Component B Quarterly Variance

Calculated as follows:

- a. The Component B Quarterly Variance for each Measurement Quarter is the dollar amount of any variation between (1) actual total Component B Costs for the Measurement Quarter and (2) forecasted total Component B Costs included in the cost of service underlying the Company's base rates for the corresponding quarter, summed with the result of the Component B Cost Variance calculation.
- b. The Component B Cost Variance calculation compares (a) the actual cost per kWh achieved during the Measurement Quarter (actual Component B Costs for the Measurement Quarter divided by actual retail kWh sales volumes for that quarter) with (b) the cost per kWh benchmark (forecasted Component B costs for the Measurement Quarter divided by forecasted retail kWh sales volumes for that quarter), and multiplies the resulting variance (in \$ per kWh) by actual retail sales in kWh for the Measurement Quarter. The Component B Cost Variance is then modified by the amounts that GMP will absorb or retain—specifically, all Component B Cost Variance up to the Component B Efficiency Band of +\$150,000 (retained by GMP) and -\$307,000 (absorbed by GMP), plus 10% of any Component B Cost Variance outside of that Component B Efficiency Band.

A list of the Company's Component A and Component B power supply costs is attached as **Attachment 4**.

The Company shall maintain separate accounts for Component A and Component B costs.

3. Return/Collection of the Retail Revenue Adjustor and Power Supply Adjustor

The quarterly adjustment associated with both the Retail Revenue Adjustor and the Power Supply Adjustor shall be filed as described above in Section VI(A)(1) & (2). These adjustors will be calculated separately, as described above, but the return/collection of these adjustments to/from customers will be based on the methodology described in Section VII below.

An example of how the Retail Revenue Adjustor and the Power Supply Adjustor will be calculated is provided as **Attachment 5**. The calculated variance for these two Adjustors will be netted against the Major Storm Adjustor and collected from or returned to customers through a separate line item ("Current Energy/Major Storm Adjustor") on the customers' bills in accordance with the methodology in Section VII.

4. GLOBALFOUNDRIES ("GF")

Revenue received from GF that is retail revenue, PPA revenue, or transition fee revenue during the Plan shall be incorporated into the Power Supply and Retail Revenue Adjustor, whether received from GF under the Term Contract as a retail customer or under the GF utility proposal pending at the time this Plan was filed.

B. Exogenous Change Adjustment

The Exogenous Change Adjustment has three components: (1) Exogenous Non-Storm Changes, (2) Exogenous Major Storm Changes during the Plan, and (3) a Major Storm Restoration Fund. Each item is described separately below.

1. Exogenous Non-Storm Changes

Exogenous Non-Storm Changes shall consist of material cost or revenue changes from the Annual Base Rate filing. Exogenous Non-Storm Changes shall be measured over each fiscal year. Cost or revenue changes are material if the incremental costs in aggregate exceed \$1.2 million in any measurement period, and they relate to the following:

1. Changes in tax laws that impact the Company.
2. Changes in Generally Accepted Accounting Principles.
3. Any Federal Energy Regulatory Commission or New England Independent System Operator rule, tariff, or other changes affecting the Company and not a part of the Power Supply Adjustor.
4. Other regulatory, judicial, or legislative changes affecting the Company not already anticipated in the design of this Plan.
5. Net loss of major customer(s) load not related to weather and not a part of the Retail Revenue Adjustor.
6. Major unplanned costs or investments, such as those incurred due to unexpected major maintenance or operations interruptions (unrelated to storms), major repairs to Company-owned power plants not a part of the Power Supply Adjustor, and major unplanned expense items such as pension settlement accounting.

The \$1.2 million for Exogenous Non-Storm changes is a threshold, not a deductible. If the threshold is met, the total incremental impact of the Exogenous Non-Storm Change will be reported 60 days after the end of each fiscal year, along with a proposal to collect costs or return revenues to customers. This may include proposing to offset the costs—or apply the revenue against—other annual adjustors in this Plan, or propose a plan to collect from or return these benefits to customers separately through a line-item credit, as it has done for federal tax reform benefits as approved by the Commission in 2018 and in the Company's 2019 base rate filing in Case No. 18-0974-TF.

Within 60 days from the end of each measurement period, the calculation associated with the Exogenous Non-Storm Change Adjustor shall be filed and

subject to review and comment by the Department. The Commission shall approve the proposed adjustments no later than 45 days prior to April 1 of the following year, so that the Exogenous Non-Storm Change Adjustor can be reflected as a separate line item on customer bills for the ensuing 12 months, unless as otherwise ordered by the Commission, commencing April 1 of each year.

2. Exogenous Major Storm Changes

Exogenous Major Storm Changes shall consist of increased costs experienced by the Company relating to the incremental maintenance expenses incurred for Major Storms (as defined in the Company's Service Quality & Reliability Performance, Monitoring & Reporting Plan (the "SQRP")), and further defined as a storm that causes the Company to incur incremental maintenance expenses in excess of \$1.2 million.

This per-storm \$1.2 million in maintenance costs is a threshold, which defines what qualifies as a "Major Storm," and is not a per-storm deductible.

To the extent the Company experiences one or more "Major Storms," in a fiscal year it may recover those costs from customers, minus a one-time annual \$1.2 million deductible that is deducted from the total aggregate cost associated with all qualifying Major Storms in any given fiscal year. The deductible shall not be applied twice to costs associated with any individual storm if collection for those costs extend into a second fiscal year period. Once this annual \$1.2 million deductible is met in any fiscal year, GMP will collect costs associated with Major Storms that occur during the term of the Plan in accordance with the methodology described in Section VII below. In the quarter following the qualifying storm, GMP will file a report documenting the invoiced costs associated with all Major Storm costs above the \$1.2 million annual deductible that occurred in that quarter. For example, invoices for a storm occurring in January that are received by March 31 would be reported 30 days from the end

of the first quarter, and any invoices for this storm received after March 31 would be reported in the next quarter (July 1).

3. Major Storm Restoration Fund

This is a regulatory liability account through which the Company will collect funds from customers in a consistent and stable method over the life of the Plan, to be used to off-set costs as described in Section VII below. Specifically, the Company will collect a Major Storm Restoration Fund through a separate line item on the bill on a surcharge percentage basis, in a total amount of \$6 million annually from customers in all customer classes. The regulatory liability associated with the Major Storm Restoration Fund will be capped at \$12 million at any one time, and GMP will accrue interest income/expense on the balance of the regulatory liability based on GMP's credit facility interest rate. The amounts collected from customers through this mechanism will be recorded to the Major Storm Restoration Fund and used to offset costs as described in Section VII below.

C. Earnings Sharing Adjustor Mechanism

The Company's rates will be subject to an Earnings Sharing Adjustor for each rate period during the Plan term. No later than 60 days after the end of each fiscal year ("ESAM Measurement Period"), the Company shall file with the Commission and Department its Actual Earnings for the ESAM Measurement Period, the proposed Earnings Sharing Adjustor calculation, and supporting information. The Commission shall approve the proposed adjustment no later than 45 days prior to April 1 of the following year, so that the Earnings Sharing Adjustor amount can be reflected as a separate line item on customer bills for the ensuing 12 months, unless otherwise ordered by the Commission, commencing April 1 of each year ("ESAM Adjustment Period"). Actual Earnings will be calculated based on the same methodology as the earnings cap calculation reflected in the PUC's Order in Docket Nos. 6946/6988 (*i.e.*, exclude the Company's disallowed costs and results of unregulated operations (but

business services shall be included in cost of service)). Actual Earnings shall include the earnings impact of the adjustments under this Plan. The Variance Amount (as defined below) shall be deferred and amortized over the ESAM Adjustment Period.

The Earnings Sharing Adjustor shall be calculated as follows:

1. Calculation of Variance Amount:

- i. If Actual Earnings reflect an ROE that is within a range equal to 50 basis points below and 50 basis points above the Commission-approved ROE during the ESAM Measurement Period, there will be no Earnings Sharing Adjustor. This +/- 50 basis point band is the ESAM Efficiency Band.
- ii. If Actual Earnings reflect an ROE that is 50 to 125 basis points above or 50 to 150 basis points below Commission-approved ROE, 75% of the revenue benefit of the higher earnings is returned to, or 50% of the revenue impact of the lower earnings is collected from, customers in the Earnings Sharing Adjustor. These +50 to +125 basis points and -50 to -150 basis points bands are the ESAM Sharing Bands.
- iii. If Actual Earnings reflect an ROE that is more than 125 basis points above or more than 150 basis points below the Commission-approved ROE, the entire revenue benefit or impact flows to customers in the Earnings Sharing Adjustor.

2. Calculation and Collection of Earnings Sharing Adjustor

- i. The Earnings Sharing Adjustor shall be a positive or negative fraction equal to:
 - a. the total dollar Variance Amount derived in Section VI(C)(1) above, divided by
 - b. projected revenues from Company charges during the Earnings Sharing Adjustor Adjustment Period, based on the Forecast Methodology.

- ii. The Earnings Sharing Adjustor fraction shall be applied to the revenue from each rate element for each rate class.
- iii. Over/under-collections of the Earnings Sharing Adjustor, due to a variance between projected and actual revenues, shall be deferred and included in the next base rate filing.

A sample calculation is attached as **Attachment 6**.

D. Residual Adjustments

The collection/return of all Adjustors under this Plan shall continue beyond the term of the Plan as allowed by this Plan or otherwise ordered by the Commission. Any over/under-collection for any Adjustor under this Plan remaining at the end of its term and not yet subject to a Commission order regarding its collection or return shall be deferred and addressed in a future regulation plan or rate filing.

VII. RECOVERY OF THE RETAIL REVENUE, POWER SUPPLY, AND MAJOR STORM ADJUSTORS

The recovery of the Retail Revenue, Power Supply, and Major Storm Adjustors will be in accordance with the following methodology:

- For each measurement quarter, the quarterly retail revenue and power supply variance amounts and the quarterly qualified major storm amount will be netted. This netted balance shall be referred to as the “Quarterly Net Adjustment.”
- If the Quarterly Net Adjustment for the current measurement quarter is in the opposite direction of the Quarterly Net Adjustment for the prior measurement quarter (*i.e.*, the current quarter nets to a return and the prior quarter netted to a collection), then the amounts of the two quarters will be netted against each other and the resulting amount will be carried forward (Cumulative Carry Forward) to the next quarter as a regulatory asset or liability.

- If the Quarterly Net Adjustment for the current measurement quarter is in the same direction as the Quarterly Net Adjustment from the prior measurement quarter and the prior quarter Cumulative Carry Forward is greater than +/- \$1M, then the prior quarter Cumulative Carry Forward will be collected /returned to customers, starting on the first day of the next quarter, over the remaining term of the Plan or the subsequent 12 months, whichever is longer, unless otherwise requested or ordered by the Commission. If the prior quarter Cumulative Carry Forward is less than +/- \$1M it will net against the current measurement quarter Net Quarterly Adjustment and be carried forward to the next quarter.

This adjustment will be calculated such that the street lighting rate class continues to be excluded from any surcharge collections or returns associated with the Retail Revenue and Power Supply Adjustors.

An illustration of this methodology is as follows:

Period	Quarter	Adjustor Filing Date	Over/(Under) Collection			Collection Trigger	Recovery Request Amount	Recovery Period		Cumulative Carry Forward
			PSRRA	Major Storm	Net Quarterly Adjustment			Start Date	End Date	
10/1/xx to 12/31/xx	Q1 FYX1	30-Jan-x1	1,000,000	1,000,000	2,000,000					2,000,000
01/1/x1 to 03/31/x1	Q2 FYX1	30-Apr-x1	(500,000)		(500,000)					1,500,000
04/1/x1 to 06/30/x1	Q3 FYX1	30-Jul-x1	1,000,000		1,000,000					2,500,000
07/1/x1 to 09/30/x1	Q4 FYX1	30-Oct-x1	1,000,000	1,250,000	2,250,000	Q4 Results	2,500,000	01-Jan-x2	30-Sep-x4	2,250,000
10/1/x1 to 12/31/x1	Q1 FYX2	30-Jan-x2	750,000	1,000,000	1,750,000	Q1 Results	2,250,000	01-Apr-x2	30-Sep-x4	1,750,000
01/1/x2 to 03/31/x2	Q2 FYX2	30-Apr-x2	(1,000,000)		(1,000,000)					750,000
04/1/x2 to 06/30/x2	Q3 FYX2	30-Jul-x2	(400,000)		(400,000)	Q3 Results	Collection Carried Forward <\$1M			350,000
07/1/x2 to 09/30/x2	Q4 FYX2	30-Oct-x2	1,000,000		1,000,000					1,350,000

For the purposes of performing the assessment described above, the Q1FY23 (first quarter under this Plan) Net Quarterly Adjustment will be compared to the Q4FY22 (last quarter under the prior Plan) Net Quarterly Adjustment. Also, any Cumulative Carry Forward at the end of Q4FY22 will be carried forward to Q1FY23.

Within 30 days of the end of each quarter, GMP will file a report summarizing the results of the quarter along with the net amount to be returned to or collected from customers, if

any, under the provisions of this Section. GMP will also file a proposed line-item charge for that amount based on a percentage of retail revenue to collect or return this amount over the remaining term of the Plan or a 12-month period, whichever is longer, on a bills-rendered basis beginning the first day of the next quarter (i.e., the second quarter after the triggering event quarter), unless otherwise requested or ordered by the Commission. This filing is subject to DPS review and PUC approval.

For accounting purposes, these quarterly variance amounts shall be deferred and amortized in the Return/Collection Period in an amount equal to the revenue increases or decreases that recover or repay the amortized amount.

GMP will include in the quarterly Revenue, Power Supply and Major Storm Adjustor report a roll-forward (Fund Beginning Balance, Fund Additions, Fund Uses, Interest Accrued, and Fund Ending Balance) of the Major Storm Restoration Fund regulatory liability account and any proposal by GMP to utilize this account to mitigate the impact and volatility of major storm costs, other adjustors or costs as approved by the Commission. The report will also include any proposal by GMP to adjust the Major Storm Restoration Fund surcharge percentage to address the \$12 million cap discussed in Section VI.B.3. These proposals for use of the Major Storm Restoration Fund will be subject to DPS review and PUC approval.

At the end of the Plan, any net deferred balances not yet approved for collection/return to customers will be handled consistent with Section VI(D) Residual Adjustments.

VIII. INNOVATION AND PERFORMANCE METRICS AND OTHER PLAN COMPONENTS

A. Plan Support of Vermont Energy Goals and Customer Service Offerings

The Plan is designed to support the Company's continued efforts toward Vermont's statewide energy goals by advancing promising technologies (e.g., electric vehicles, heat pumps, energy storage, renewable power, etc.) and by exploring new services to facilitate efficient, low-carbon energy choices made by electric customers consistent with least cost principles.

The Company will also continue to work with the Department to explore and implement additional innovative service choices and offerings, such as on-bill payments to support decarbonization, load control programs and support, and smart home energy devices in an ever-changing landscape.

B. Innovative Pilot Program

The Innovative Pilot provision of the prior regulation plan continues through this Plan with minor updates, as outlined in **Attachment 2**. New Innovative Pilots developed during the term of the Plan that are not already included in base rates shall not result in any plant additions that cause rate adjustments under this Plan, except insofar as they are specifically requested to be included in base rates under the New Initiative Tariff Offerings provision in Section IV(A)(1)(iv). Any changes to revenue or power supply cost that result from New Initiative programs will be included in adjustments made pursuant to the Retail Revenue Adjustor or the Power Supply Adjustor.

C. Service Quality

The Company's Service Quality & Reliability Performance Monitoring and Reporting Plan ("SQRP"), as it may be amended from time to time, is hereby incorporated into and made a part of this Plan.

D. Innovation & Performance Metrics

The Company shall measure and annually report on the Innovation and Performance Metrics identified in **Attachment 7**.³ These metrics shall be measured on a fiscal year basis except where otherwise indicated on the attachment and will be provided for purposes of tracking only. There will be no penalties or incentives associated with tracking these metrics during the term of the Plan. An annual report on these metrics shall be filed by January 30 for the preceding fiscal year period, along with a brief

³ These will be supplemented by those additional metrics that are to be reported consistent with the Commission's Orders in Case No. 23-3501-PET (regarding ZOI), Case No. 24-1715-PET (ESS New Initiative investment), and any future related order.

narrative evaluation of the effectiveness of the Plan's performance in achieving the goals of 30 V.S.A. § 218d.

E. Low Income

The Company shall match contributions by its customers to the Company's Warmth Program, and the amount of the Company's match shall not be included in rates. In addition, The Company will contribute 5% of any excess earned utility net income above the allowed utility net income to its low-income customer support programs, after consultation with the Department of Public Service and its Consumer Affairs division.

F. Benchmark Report

The Company will file an annual Benchmark Report an example of which is provided as **Attachment 9**. The report will be prepared from annual calendar year FERC Form 1s and filed by June 1 for the preceding calendar year (i.e. the calendar year 2023 report will be filed by June 1, 2024).

G. ESS Tariff New Initiative FY22 Carry-over

Additional ESS Tariff installations approved by the Commission in Case No. 21-1965-PET for enrolled customers may be completed and closed to plant through FY23.

The final reporting of additional ESS Tariff plant installations completed or expected to be completed through FY23, and a proposal for any cost of service true-ups, will be submitted as part of the FY24 annual base rate filing.

IX. LIMITATIONS ON OTHER RATE CHANGES

No general rate adjustment, other than as allowed and described herein will be implemented between October 1, 2022 and September 30, 2026, except that the Company may seek temporary rate increases pursuant to 30 V.S.A. § 226(a), and the Company may file modified or new tariffs for services and adjustments other than for base rates subject

to Commission approval pursuant to 30 V.S.A. §§ 218f, 225, 226, 227, or any other statutory provision.

X. MISCELLANEOUS

- A. During the term of the Plan, the application of Title 30 including 30 V.S.A. §§ 218(a), 225, 226, 227, and 229 to GMP shall be modified by the provisions of the Plan and the Commission order approving the Plan.
- B. The Company shall continue to file concurrently with each Adjustor filing the type of documentation it has previously filed under prior regulation plans with respect to each type of filing.
- C. The Company shall describe the Plan in a separate mailing at least one month prior to the first-rate adjustment under the Plan and shall work with the Department in the development of customer communications and materials to be provided to customers. The Company will also hold twice yearly meetings with customers, one in its northern service territory and one in its southern service territory if in person, to answer questions and review its performance under the Plan, including a discussion of the innovation and performance metrics tracked under the Plan.
- D. Nothing in the Plan will be interpreted as preventing the Department from requesting a Commission investigation into the Company's rates or the Commission from undertaking such an investigation. The retroactive effect of any such investigation shall be consistent with 30 V.S.A. § 227(b).
- E. The Company shall file for any successor regulation plan twelve months prior to its proposed effective date (anticipated to be September 1, 2025).

GREEN MOUNTAIN POWER
MULTI-YEAR REGULATION PLAN
Attachment 1(a) Summary of COS Treatment

COST OF SERVICE	Method to Establish FY 2023	Method to Establish Initial FY24 to FY26 Forecast	Method to Establish Updated FY24 to FY26 Forecast & Annual Refresh	Relevant Adjustor, not including ESAM	Power/Non Power Costs
Operating Expenses:					
Purchased Power, Net	Known and Measurable adjustments to FY 2021 Test Year	Current forecasts of FY24 to FY26 Costs	Reforecast Annually	Power Adjustor	Power Cost
Production	Known and Measurable adjustments to FY 2021 Test Year	Current forecasts of FY24 to FY26 Costs	Reforecast Annually	Power Adjustor	Power Cost
Transmission	Known and Measurable adjustments to FY 2021 Test Year	Current forecasts of FY24 to FY26 Costs	Reforecast Annually	Power Adjustor	Power Cost
Other Power Supply *					
Transmission - Other *					
Distribution *					
Customer Accounting *	Known and Measurable adjustments to FY 2021 Test Year	See Attachment 1(c)	See Attachment 1(c) for Breakout of Inflation Index Adjusted, Fixed and Reforecast Components		Non-Power Cost
Customer Service and Information *					
Sales *					
Administrative and General *					
Plant Depreciation	Known and Measurable adjustments to FY 2021 Test Year	Based on the plant-in-service balances at the end of the FY23 rate year from the FY23 base rate filing, the locked plant additions and estimated retirements for FY24 to FY26, and depreciation accrual rates applied to these plant-in-service balances	Fixed for term of plan based on initial FY24-FY26 forecast. Forecast can be adjusted to reflect any additional allowed capital expenditures approved by the PUC		Non-Power Cost
Regulatory Amortizations	Known and Measurable adjustments to FY 2021 Test Year	Except for approved adjustments, based on the amortization of regulatory assets and liabilities included in the FY23 base rate filing	Except for approved adjustments, fixed for term of plan based on initial FY24-FY26 forecast		Non-Power Cost
Taxes - Federal and State	Known and Measurable adjustments to FY 2021 Test Year	Based on current statutory federal and state income tax rates adjusted for forecasted book and tax permanent differences, income tax credits and the amortization of the ADIT tax reform regulatory liability	Formulaic calculation based on annual reforecast		Non-Power Cost
- Municipal	Known and Measurable adjustments to FY 2021 Test Year	The historical property tax trend percentage of 3.89% used to develop the FY23 property tax expense was applied to the FY23 property tax expense to develop the initial FY24 to FY26 forecast	Fixed for term of plan based on initial FY24-FY26 forecast. Forecast can be adjusted to reflect any additional allowed capital expenditures approved by the PUC		Non-Power Cost
- Other, excluding Revenue Taxes	Known and Measurable adjustments to FY 2021 Test Year	This represents payroll taxes. The projected annual salaries and wages adjustment percentages used to develop the initial forecasted FY24 to FY26 salaries and wages expense were applied to the FY 23 payroll tax expense to develop the initial FY24 to FY26 forecast	Fixed for term of plan based on initial FY24-FY26 forecast.		Non-Power Cost
Accretion Expense	Known and Measurable adjustments to FY 2021 Test Year	All Years Forecasted	Fixed for term of plan based on initial FY24-FY26 forecast		Non-Power Cost
Capital Costs	Known and Measurable adjustments to FY 2021 Test Year	Initial FY24 to FY26 forecast developed by adjusting the FY23 expense for forecasted changes in the amortization of debt issuance costs, fees paid on GMP's credit facility, and the return on REC inventory based on GMP's credit facility borrowing rate	Fixed for term of plan based on initial FY24-FY26 forecast		Non-Power Cost
Return on Utility Rate Base	Known and Measurable adjustments to FY 2021 Test Year	Initial FY24 to FY26 forecast developed by applying the forecasted after-tax weighted average cost of capital to the forecasted 13-month average rate base. Scheduled debt redemptions, forecasted debt issuances and respective interest rates, and forecasted credit facility borrowings and credit facility interest rate were reflected in the initial FY24 to FY26 forecast. The return on equity remained constant (8.57%) over the term of the initial forecast	Cost of Debt % fixed for term of plan based on updated FY24-FY26 forecast filed with FY24 Annual Base Rate Filing. Cost of Equity % is formulaic annual adjustment based on index; See Attachment 3		Non-Power Cost
Credits:					
Transco Equity in Earnings of Affiliates	Known and Measurable adjustments to FY 2021 Test Year	Based of Forecast prepared by VT Transco	Reforecast Annually		Non-Power Cost
Equity in Earnings of Affiliates Other than Transco	Known and Measurable adjustments to FY 2021 Test Year	JV Solar - Battery equity in earnings for the initial FY24 to FY26 forecast based on model developed by CohnReznick. All other equity in earnings equal their FY23 amounts	Fixed for term of plan based on initial FY24-FY26 forecast		Non-Power Cost
Other Operating Revenues	Known and Measurable adjustments to FY 2021 Test Year	Represents other operating revenue generated from various utility activities. Certain components within this category are adjusted by forecasted inflation (mutual aid) or by current forecasts (pole attachment, EIC and transmission revenues) while other components equal the FY23 amount (connection charges, application fees and contributions in aid of construction tax adder)	Fixed for term of plan based on initial FY24-FY26 forecast. Forecast can be adjusted to reflect any additional allowed capital expenditures approved by the PUC	Plan modified to include modeled revenue associated with GF transition fee in Power Supply/Retail Revenue Adjustor	Non-Power Cost
Business Development, Net	Known and Measurable adjustments to FY 2021 Test Year	Represents the revenue collected net of expenses incurred from performing work on non-GMP property. Initial FY24 to FY26 forecasted amounts equal FY 23 amount	Fixed for term of plan based on initial FY24-FY26 forecast		Non-Power Cost
Gross Revenue & Fuel Gross Receipts Taxes	Formulaic calculation based on cost of service	Formulaic calculation based initial forecasts	Formulaic calculation based on annual reforecast		Non-Power Cost
Revenue from Ultimate Consumers	Forecasted	Forecast prepared by third-party vendor	Reforecast Annually	Retail Revenue Adjustor	Non-Power Cost
Initial Rate Smoothing Mechanism	Set for FY24-FY26 based on Final FY24-FY26 forecast filed with FY24 Annual Base Rate Filing				Non-Power Cost

* Formerly part of the Platform.

GREEN MOUNTAIN POWER
MULTI-YEAR REGULATION PLAN
Attachment 1(b) Summary of Rate Base Treatment

RATE BASE	Method to Establish FY 2023	Method to Establish Initial FY24 to FY26 Forecast	Method to Establish Updated FY24 to FY26 Forecast & Annual Refresh
Utility Plant in Service	Known and Measurable adjustments to FY 2021 Test Year	Based on the plant-in-service balances at the end of the FY23 rate year from the FY23 base rate filing, the locked FY24 to FY26 plant additions and estimated retirements	Fixed for term of plan based on initial FY24-FY26 forecast. Balance can be adjusted to reflect any additional allowed capital expenditures approved by the PUC
Community Energy & Efficiency Development Fund	Known and Measurable adjustments to FY 2021 Test Year	Based on the CEED balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the CEED amortization reflected in the initial FY24 to FY26 forecast	Fixed for term of Plan based on initial FY24-FY26 forecast
Construction Work in Progress	CWIP Balance based on FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of plan based on initial FY24-FY26 forecast. Balance can be adjusted to reflect any additional allowed capital expenditures approved by the PUC
Investment in Affiliates:			
Generation Vermont Yankee	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Generation Maine Yankee	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Generation Connecticut Yankee	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Generation Yankee Atomic	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Green Lantern	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Transmission NE Hydro Trans	Known and Measurable adjustments to FY 2021 Test Year	Based on Forecast	Fixed for term of Plan based on initial FY24-FY26 forecast
Transmission NE Hydro Trans Electric	Known and Measurable adjustments to FY 2021 Test Year	Based on Forecast	Fixed for term of Plan based on initial FY24-FY26 forecast
Transmission VELCO - Common	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
JV Solar - Battery	Known and Measurable adjustments to FY 2021 Test Year	Based on Forecast	Fixed for term of Plan based on initial FY24-FY26 forecast
Transmission TRANSCO LLC	Known and Measurable adjustments to FY 2021 Test Year	Based of Forecast prepared by VT Transco	Reforecast Annually
Special Deposits	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Unamortized Debt Discount and Expense	Known and Measurable adjustments to FY 2021 Test Year	Based on the balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the debt issuance cost amortization reflected in the initial FY24 to FY26 forecast and the initial forecasted FY24 to FY26 issuance cost incurred on new debt	Fixed for term of Plan based on initial FY24-FY26 forecast
Regulatory Assets	Known and Measurable adjustments to FY 2021 Test Year ¹⁾	Based on the regulatory asset balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the regulatory asset amortization reflected in the initial FY24 to FY26 forecast ¹⁾	Except for approved adjustments, fixed for term of plan based on initial FY24-FY26 forecast ¹⁾
Tax FAS 109	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Working Capital Allowance:			
Material and Supplies Inventory including Fuel	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Millstone III Nuclear Fuel Inventory (Net)	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Prepayments	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Lead-Lag Working Capital Allowance	Formulaic annual calculation based on other COS components	Formulaic annual calculation based on other COS components	Fixed for term of Plan based on initial FY24-FY26 forecast
DEDUCTIONS:			
Accumulated Depreciation	Known and Measurable adjustments to FY 2021 Test Year	Based on the balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the depreciation expense and retirements reflected in the initial FY24 to FY26 forecast	Fixed for term of plan based on initial FY24-FY26 forecast. Balance can be adjusted to reflect any additional allowed capital expenditures approved by the PUC
Customer Advances for Construction	Known and Measurable adjustments to FY 2021 Test Year	Based on the balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the FY24 to FY26 amortization reflected in income tax expense in the initial FY24 to FY26 forecast	Fixed for term of Plan based on initial FY24-FY26 forecast
Deferred Credits			
Accumulated Deferred Income Taxes and Tax Reform Regulatory Liability	Known and Measurable adjustments to FY 2021 Test Year	Based on the balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the forecasted FY24 to FY26 book and tax temporary differences and amortization of the ADIT tax reform regulatory liability	Reforecast Annually
Accumulated Deferred Investment Tax Credits	Known and Measurable adjustments to FY 2021 Test Year	Based on the balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the amortizations reflected in the initial FY24 to FY26 forecast	Fixed for term of Plan based on initial FY24-FY26 forecast
Regulatory Liabilities	Known and Measurable adjustments to FY 2021 Test Year	Based on the regulatory liability balance at the end of the FY23 rate year from the FY23 base rate filing adjusted for the regulatory liability amortization reflected in the initial FY24 to FY26 forecast	Except for approved adjustments, fixed for term of plan based on initial FY24-FY26 forecast
Deferred Comp	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
SERP	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast
Accrued Pension Expense	Known and Measurable adjustments to FY 2021 Test Year	Based on forecast provided by Willis Towers Watson (WTW), GMP's benefits consultant	Reforecast Annually
Acc. Post-Ret. Medical Expense FAS 106	Known and Measurable adjustments to FY 2021 Test Year	Based on forecast provided by WTW, GMP's benefits consultant	Reforecast Annually
Acc. Other Post-Employment Ben. Exp. FAS 112	Known and Measurable adjustments to FY 2021 Test Year	Equals the FY23 base rate filing balance	Fixed for term of Plan based on initial FY24-FY26 forecast

¹⁾ The Tier III Regulatory Asset in Rate base will be updated each year to reflect the preceding December 31st balance. For FY 2023, the Tier III regulatory asset balance will reflect GMP's general ledger balance as of December 31, 2021. At the end of each year, GMP will calculate the difference between the Tier III return collected through base rates and the amount that would have been collected if the actual fiscal year Tier III 13-month average regulatory asset was reflected in base rates. GMP will include this information in its annual ESAM filing and will propose as needed any collection from or return to customers in a future base rate filing. In addition, going forward GMP will include the 12/31 Tier III regulatory asset balance in its annual Renewable Energy Standard Tier III Savings Claim Report filed with the PUC each March, so future base rate filing Tier III regulatory asset balances can be directly taken from this report.

COST OF SERVICE - O&M

Method to Establish FY 2023	O&M Category	Fixed/Reforecast ¹⁾	Method to Establish Initial FY24 to FY 2026 Forecast	Method to Updated FY24 to FY26 Forecast & Annual Refresh FY 2024 FY 2025 FY 2026
Known and Measurable adjustments to FY 2021 Test Year	Other Power Supply - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, including over-time	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	Fleet	Fixed	FY2023 Adjusted by the initial forecasted projected annual salaries and wages adjustment percentages, as well as impacts of new leasing program	Fixed for term of plan based on initial FY24-FY26 forecast
	Transmission – Other - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, including over-time	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	Tree Trimming (includes EAB)	Reforecast	Based on GMP's Current Tree Trimming Plan	Reforecast based on GMP's Tree Trimming Plan
	Fleet	Fixed	FY2023 Adjusted by the initial forecasted projected annual salaries and wages adjustment percentages, as well as impacts of new leasing program.	Fixed for term of plan based on initial FY24-FY26 forecast
	Distribution - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, including over-time	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	Tree Trimming (Includes EAB)	Reforecast	Based on GMP's Current Tree Trimming Plan	Reforecast based on GMP's Tree Trimming Plan
	Fleet	Fixed	FY2023 Adjusted by the initial forecasted projected annual salaries and wages adjustment percentages, as well as impacts of new leasing program.	Fixed for term of plan based on initial FY24-FY26 forecast
	Customer Accounting - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, including over-time	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	Uncollectible Expense	Reforecast	FY 2023 Adjusted for initial forecast annual base rate changes	FY 2023 Adjusted for annual rate change and an AR Aging adjustment if applicable
	Fleet	Fixed	FY2023 Adjusted by the initial forecasted projected annual salaries and wages adjustment percentages, as well as impacts of new leasing program	Fixed for term of plan based on initial FY24-FY26 forecast
	Customer Service and Information - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, including over-time	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	Fleet	Fixed	FY2023 Adjusted by the initial forecasted projected annual salaries and wages adjustment percentages, as well as impacts of new leasing program	Fixed for term of plan based on initial FY24-FY26 forecast
	Sales - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, including over-time	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	Administration and General - Excluding Items Listed Below	Inflation Index Adjusted	FY 2023 adjusted by forecasted CPI-NE	Initial FY24 to FY26 forecast adjusted for inflation (CPI-NE) ²⁾
	Payroll, Over-time, and 401(k) Match	Fixed	FY 2023 adjusted by the initial forecasted projected annual salaries and wages adjustment percentages	Fixed for term of plan based on initial FY24-FY26 forecast
	A&G Capitalized	Fixed	FY 2023 adjusted to reflect FY 2024 to FY2026 locked annual plant additions	Based on locked capital spending between FY23-FY26 in initial forecast filed in FY23 Rate Case
	Pension	Reforecast	Based on forecast provided by Willis Towers Watson (WTW), GMP's benefits consultant	Based on annual forecasts prepared by GMP's Actuaries. Settlement accounting entry if applicable – deferred
	Active Medical	Reforecast	Based on forecast provided by WTW	Based on annual projection prepared by GMP consultant
	Post-Retirement	Reforecast	Based on forecast provided by WTW	Based on annual projection prepared by GMP consultant
	Insurance Premiums	Reforecast	FY2023 Adjusted by inflation factor of 2% per year for FY2024 - FY2026	Based on Insurance Broker indication of premium change
	Fleet	Fixed	FY2023 Adjusted by the initial forecasted projected annual salaries and wages adjustment percentages, as well as impacts of new leasing program	Fixed for term of plan based on initial FY24-FY26 forecast

¹ Fixed categories are locked year-over-year based on forecasts (following any specified adjustments from FY 23)

² Reforecast categories are adjusted during each annual base rate filing based on the specified forecast methodology

^{1,2} Inflation Index Adjusted categories are adjusted during each annual base rate filing based on the actual change in the CPI-NE for the twelve months ending March 31 of each year. For example, the inflation adjustment for Fiscal Year 2024 will be the change in CPI-NE for the twelve months ending March 31, 2023.

GMP – Non-Tariffed Innovative Pilot Program

Eligibility:

The Non-Tariffed Innovative Pilot Program shall be available for pilot programs involving products or services, beyond the sale of basic electric service, that provide shared access to Green Mountain Power (“GMP”), and advance the goals of Vermont’s state energy policy, including the Renewable Energy Standard, or are otherwise designed to enable such programs in the future or to improve equity of access to renewable and clean energy programs for low- and moderate-income communities (“Innovative Pilots”).

Proposal:

New Innovative Pilots

GMP shall file 15 days’ advance notice with the Department of Public Service (“Department”) and the Public Utility Commission (“Commission”), with a copy to Efficiency Vermont, before commencing pilot programs to provide the products or services referenced above. The notice shall include a narrative explanation of the Innovative Pilot and how it is consistent with the eligibility requirements, the number of customers it will be made available to and how those eligible customers were selected, expected costs and revenues, why the proposal does not conflict with work performed by Efficiency Vermont, a certification that GMP has collaborated with Efficiency Vermont regarding the proposal in advance of the filing, and the frequency by which GMP shall provide status reports to the Commission and Department on the Innovative Pilot’s progress. GMP will include Renewable Energy Vermont (“REV”) in the notice, collaboration, and reporting provisions with the Department of Public Service, the Public Utility Commission, and Efficiency Vermont on these pilots and any follow-on tariffs. GMP and REV will make its best efforts and collaborate in good faith on these pilots and any follow-on tariffs.

Term

All Innovative Pilots shall be limited to a term of eighteen months.

Data Collection and Reporting

GMP will track all costs and revenues, broken out by expense or revenue category, associated with all Innovative Pilots.

GMP will also collect data and provide reports to the Commission, Department and REV, as detailed in GMP’s “Data Collection and Reporting Plan” attached to this proposal.

Amendments to Terms and Conditions of Innovative Pilots

GMP shall file 7 days’ advance notice of changes to Innovative Pilots’ pricing, terms, or conditions with the Department, Efficiency Vermont, REV, and the Commission. GMP shall also provide written notice of all such changes to affected participating customers.

On-Going Review of Innovative Pilots

Any Annual Rate Base filing during the term of the Multi-Year Regulation Plan in which GMP seeks to reflect the costs and revenues of Innovative Pilots developed under this Plan that are not already included in rates at the start of the Plan shall include a schedule setting forth the costs and revenues of all

Innovative Pilots offered as well as known and measurable information supporting the addition to rate base and shall be subject to Department review and Commission approval.

Comparable Third-Party Offerings

For any new GMP tariff or pilot program that focuses on an available consumer product, GMP will offer a comparable, parallel Third-Party pilot or tariff, either separately or within the same pilot or tariff, where feasible. The Third-Party program may require connection to GMP's Distributed Energy Resource platform to ensure inter-operability with utility grid management requirements, and may include an option for customers to elect to pay for these Third-Party offerings through appropriate charges on their GMP bill.

Green Mountain Power Innovative Pilots Data Collection and Reporting Plan

The following is Green Mountain Power's ("GMP") Data Collection and Reporting Plan for its Innovative Pilot projects.

Innovative Pilots are offered under the provisions of GMP's Multi-Year Regulation Plan ("MYRP"), as outlined in GMP's Non-Tariffed Innovative Pilot Program ("Innovative Pilot Program") (Attachment 2 of the MYRP). In order to assess whether an Innovative Pilot should be advanced into a mature program, GMP will collect data and report to the Department of Public Service ("DPS" or "Department"), Renewable Energy Vermont ("REV") and the Public Utility Commission ("Commission") as provided in this Data Collection and Reporting Plan.

I. Commencement of Innovative Pilot

As provided in the Innovative Pilot Program, GMP will file 15 days' advance notice with the Department of Public Service ("Department") and the Public Utility Commission ("Commission"), with a copy to Efficiency Vermont and REV, before commencing an Innovative Pilot. The notice shall include a narrative explanation of the Innovative Pilot, and explain how the Pilot is consistent with the eligibility requirements in Attachment 2, the number of customers to whom it will be made available, how those eligible customers were selected, expected costs and revenues, why the proposal does not conflict with work performed by Efficiency Vermont, a certification that GMP has collaborated with Efficiency Vermont regarding the proposal in advance of the filing, and the frequency by which GMP shall provide status reports to the Commission and Department on the Innovative Pilot's progress.

II. Status Reports

GMP shall file with the Commission, copying the Department and REV, reports of the status of the Pilot. The reports shall be submitted thirty days after each six-month interval except for the final report, which is detailed below. The reports shall provide the following information:

- i. Brief description of the Innovative Pilot.
- ii. Customer participation in the Innovative Pilot including the number of products or units, number of customers enrolled, and the distribution of the product by county/town.
- iii. Financial information regarding the costs and revenues where applicable (equipment revenue, additional kWh margin, O&M maintenance, O&M service, depreciation, return on rate base, and net gain or loss).
- iv. Load control device saturation information, where applicable, including whether the product is controlled by GMP for peak shaving purposes, and if so, the number of units controlled, the control device, the response rate, and capacity available in kilowatts.
- v. Narrative explanation of how the Innovative Pilot is advancing the goals of the Innovative Pilot program outlined in the eligibility requirements in Attachment 2.
- vi. Next steps.

III. Customer Satisfaction Measurement

In addition to regular customer contact, after the Innovative Pilot has been in operation for one year, GMP shall measure participating customers' satisfaction with the Pilot. The survey should include an assessment of whether the customers' needs/goals were met by the product or service provided in the Pilot. GMP shall work with the Department on appropriate measurements for each Pilot.

IV. Final Report

Sixty days after the end of the eighteen-month pilot, GMP shall file with the Commission, copying the Department and REV, a final report on the Pilot. The report shall include the following information, an example of which is attached to this Data Collection and Reporting Plan:

- i. Brief description of the Innovative Pilot.
- ii. Customer participation in the Innovative Pilot including the number of products or units, number of customers enrolled, and the distribution of the product by county/ town.
- iii. Financial information regarding the costs and revenues where applicable (equipment revenue, additional kWh margin, O&M maintenance, O&M service, depreciation, return on rate base, and net gain or loss).
- iv. Load control device saturation information, where applicable, including whether the product is controlled by GMP for peak shaving purposes and if so, the number of units controlled, the control device, the response rate, and capacity available in kilowatts.
- v. Narrative explanation of how the Innovative Pilot advanced the goals of the Innovative Pilot program.
- vi. Assessment of customer satisfaction.
- vii. Lessons learned during the Innovative Pilot.
- viii. Whether the Innovative Pilot will be advanced to a tariff-based offering, and if so, why.
- ix. If the Innovative Pilot will not be advanced to a tariff-based offering, the reasons why not.



Date

Ms. Holly Anderson, Clerk
VERMONT PUBLIC UTILITY COMMISSION
Peoples United Bank Building, 4th Floor 112 State Street
Montpelier, VT 05620-2701

Re: Innovative Pilot [**INSERT NAME OF PILOT**]
Final Report

Dear Ms. Anderson:

Green Mountain Power (“GMP”) provides this Final Report (“Report”) pursuant to its Innovative Pilot Program (Attachment 2 of GMP’s Multi-Year Regulation Plan). This Report covers the period from the commencement of the Pilot on [**INSERT DATE**] to the completion of the Pilot on [**INSERT DATE**].

Brief Description of [INSERT NAME OF PILOT**]**

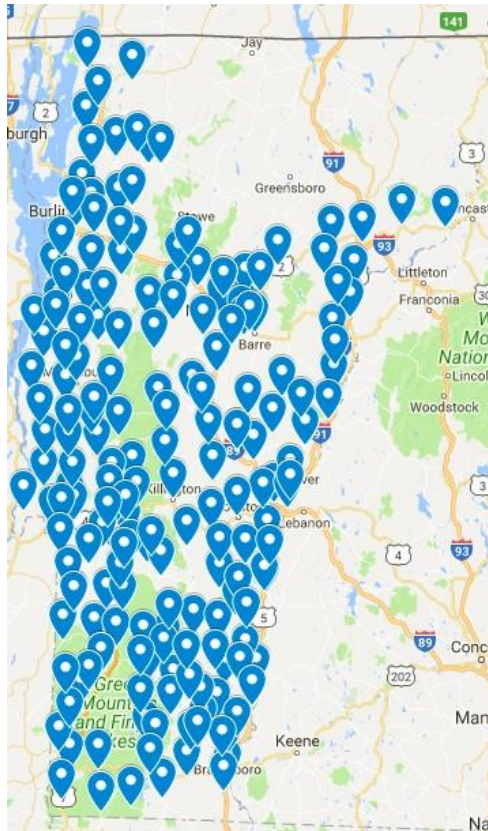
[**NARRATIVE**]

Participation in Pilot

[**NARRATIVE EXPLANATION - include the number of products or units, number of customers enrolled, and the distribution of the product by county/town**]

Below is a map illustrating the distribution of the GMP [**INSERT NAME OF PRODUCT**] in customer homes throughout our territory:

[**INSERT MAP (sample below)**]



Final Pilot Financials

[NARRATIVE EXPLANATION OF FINANCIALS AND INCLUDE FINANCIAL CHART – sample below]

PILOT NAME	CY __ Actuals
Cumulative Installs	
CY __ Installs	
Equip Revenue	\$
Add'l kWh Margin	\$
O&M Maintenance	\$
O&M Service	\$
Depreciation	\$
Return on Rate Base	\$
Other	\$
Net Gain/Loss	\$

Load Control Device Saturation

[NARRATIVE EXPLANATION – sample graphic below]

Sample: Device Controlled	Systems Installed	Systems Controlled	Response Rate	Capacity Available
Tesla Powerwalls	12	12	99%	120kW/324kWh

The [INSERT NAME OF PILOT] Pilot Advances the Goals of the Innovative Pilot Program

[NARRATIVE EXPLANATION]

Assessment of Customer Satisfaction

[NARRATIVE EXPLANATION OF RESULTS OF CUSTOMER SATISFACTION SURVEY INCLUDING ASSESSMENT OF WHETHER THE CUSTOMERS’ NEEDS/GOALS WERE MET BY THE PILOT]

Lessons Learned

[NARRATIVE EXPLANATION OF LESSONS LEARNED]

The Pilot Will/Will Not Be Advanced to A Tariff-based Offering

[NARRATIVE EXPLANATION OF WHETHER PILOT WILL BE ADVANCED TO TARIFF-BASED OFFERING AND WHY OR WHY NOT]

Conclusion

cc: Service List

Annual ROE Indexing Methodology

Except for the first year of the Plan, GMP's allowed Return on Equity ("ROE") shall be indexed using the following equation:

$$ROE_t = ROE_{t-1} + [0.50 \times (10B_t - 10B_{t-1})]$$

In this formula, 50% of the change in the 10-yr Treasury bond yield will determine the adjustment to the ROE (specified as ROE_t) from its starting ROE (specified as ROE_{t-1}). The ROE for the first year of the Plan will be set as specified in the Plan. The annual update adjustment will take place on May 15th of each year of the Plan. The bond yield at time "t", will be determined by taking the daily average of the 3 calendar months prior to and including the adjustment date, i.e. February 16th to May 15th, reported by the U.S. Department of the Treasury, Daily Treasury Yield Curve Rates, found at <https://www.treasury.gov/resource-center/data-chart-center/interest-rates/Pages/TextView.aspx?data=yieldYear&year=2019>. For each subsequent year of the Plan, the starting bond yield ("t-1") will reflect the daily average from the last May 15th update reviewed and approved by the Commission, such that the ROE adjustment takes place at the beginning of each fiscal year and is keyed to changes in average yields based on the current and previously approved May 15th 3-month daily averages.

Summary of GMP Power Supply Expenses

	Additional description	Proposed PSA Component	FERC Account Number	Rationale
Jointly Owned Units - Non-fuel O&M				
Operation – Supervision & Eng	Steam	A	500	Little/no GMP control
Steam Expense	Steam	A	502	" "
Steam From Other Sources	Steam	A	503	" "
Steam Transfer Credit	Steam	A	504	" "
Electric Expenses	Steam	A	505	" "
Misc Steam Expenses	Steam	A	506	" "
Rents	Steam	A	507	" "
Allowances	Steam	A	509	" "
Maintenance Supervision & Eng	Steam	A	510	" "
Maintenance of Structures	Steam	A	511	" "
Maintenance of Boiler Plant	Steam	A	512	" "
Maintenance of Electric Plant	Steam	A	513	" "
Maintenance of Misc Steam Plant	Steam	A	514	" "
Maintenance of Steam Production Plant Non-Major	Steam	A	515	" "
Operation – Supervision & Eng	Nuclear	A	517	" "
Coolants and Water	Nuclear	A	519	" "
Misc Nuclear Power Expense	Nuclear	A	520	" "
Steam from Other Sources	Nuclear	A	521	" "
Steam Transferred-Cr	Nuclear	A	522	" "
Electric Expenses	Nuclear	A	523	" "
Misc Nuclear Power Expenses	Nuclear	A	524	" "
Rents	Nuclear	A	525	" "
Maintenance Supervision & Eng	Nuclear	A	528	" "
Maintenance of Reactor Plant Eq	Nuclear	A	529	" "
Maintenance of Electric Plant	Nuclear	A	530	" "
Maintenance of Misc Steam Plant	Nuclear	A	531	" "
Maintenance of Misc Nuclear Plant	Nuclear	A	532	" "
Operation – Supervision & Eng	Other	A	546	" "
Generation Expense	Other	A	548	" "
Misc	Other	A	549	" "
Rents	Other	A	550	" "
Maintenance of Supervision & Eng	Other	A	551	" "
Maintenance of Structures	Other	A	552	" "
Maintenance of Misc	Other	A	553-554	" "

	Additional description	Proposed PSA Component	FERC Account Number	Rationale
GMP Owned Units - Non-fuel O&M				
Operation – Supervision & Eng	Hydro	B	535	Under GMP control
Water of Power	Hydro	B	536	" "
Hydraulic Expenses	Hydro	B	537	" "
Electric Expenses	Hydro	B	538	" "
Misc Hydraulic power gen expense	Hydro	B	539	" "
Rents	Hydro	B	540	" "
Maintenance Supervision & Eng	Hydro	B	541	" "
Maintenance of Structures	Hydro	B	542	" "
Maintenance of Reservoirs, Dams, etc	Hydro	B	543	" "
Maintenance of Electric Plant	Hydro	B	544	" "
Maintenance of Misc Hydraulic plant	Hydro	B	545	" "
Operation – Supervision & Eng	Other	B	546	" "
Fuel	Other	B	547	" "
Generation Expense	Other	B	548	" "
Misc	Other	B	549	" "
Rents	Other	B	550	" "
Maintenance of Supervision & Eng	Other	B	551	" "
Maintenance of Structures	Other	B	552	" "
Maintenance of Misc	Other	B	553-554	" "
Purchased Transmission and related ISO-NE OATT, Market Services	FERC Account 565. Primarily ISO-NE and VELCO costs. Smaller fractions of Phase I/2 support costs, NEPCO, NYPA.	A	565	Little/no GMP control, likely volatility.
Transmission by Others	VELCO VTA, Regional Network Service (NOATT 1 and 9), Phase I/II support costs, National Grid (OATT, G-33, Ashuelot), SPEED, VEC, etc	A	565	Little/no GMP control
Schedule 2 VAR Charges/Credits				
Schedule 2 VAR Charges/Credits	Reactive power and voltage support	A	561.4	Little/no GMP control
Schedule 16 Black Start Credits/Charges				
Schedule 16 Black Start Credits/Charges	System restoration payments to GMP for its units with black start capability	A	561.8	" "
ISO Sched 1 RNS				
ISO Sched 1 RNS	Scheduling, system control & dispatch for RNS load	A	561.4	" "
ISO Sched 1 Through & Out				
ISO Sched 1 Through & Out	Scheduling, system control & dispatch for Through or Out load	A	561.4	" "
ISO Sched 2				
ISO Sched 2	Administrative charges for energy market administration	A	575.7	" "
ISO Sched 3				
ISO Sched 3	Reliability market administration	A	561.8/575.7	" "
ISO Sched 4				
ISO Sched 4	Allocated FERC charges	A	575.7	" "

	Additional description	Proposed PSA Component	FERC Account Number	Rationale
ISO Sched 5	NESCOE Charge	A	575.7	" "
Interest and Late Fees		A	565	Booked as Energy charge
NEPOOL Expenses	attorney fees for NEPOOL activities	A	565	
Rents Trans		A	567	Little/no GMP control
GMP Owned Units - Fuel	Includes hydro units, peaking units and Searsburg	B	547	All energy costs in B
Jointly Owned Units - Fuel	Includes Wyman 4, Stony Brook, McNeil, Millstone	B	501/518/547	" "
Power Transaction related accounts				
Existing Long-term Contracts - Energy Charges	Capacity in A, Energy in B	B	555	All energy costs in B
Existing Long-term Contracts - Capacity Charges	Capacity in A, Energy in B	A	555	Changes fundamentally not under GMP control.
Existing Long-term Sales for Resale - Energy Revenues	Capacity in A, Energy in B	B	447	All energy costs in B.
Existing Long-term Sales for Resale - Capacity Revenues	Capacity in A, Energy in B	A	447	Changes fundamentally not under GMP control.
Future bilateral purchases & sales of Energy - Energy Charges	Capacity in A, Energy in B	B	555, 447	All energy costs in B.
Future bilateral purchases & sales of Energy - Capacity Charges	Capacity in A, Energy in B	A	555, 447	
Future bilateral purchases & sales of capacity	Capacity in A, Energy in B	A	555, 447	
Financial Hedging Instruments (for energy costs)		B	555	Used to hedge energy costs
REC sale revenues (or purchase costs)	Renewable energy credits	B	447	All energy costs in B
RES compliance costs	Renewable energy standard	B	555	
Other Power Supply	Power Purchased Storage Operations	A	555	Matches revenues one-for-one so should not be subject to Component B deadband.
ISO Market Settlement Accounts				
Day Ahead Energy	Includes cost of GMP load obligation & revenue from all GMP resources	B	555	Energy Component Only - All Energy in B
Real Time Energy	Includes cost of GMP load obligation & revenue from all GMP resources	B	555	Energy Component Only - All Energy in B
Energy losses	The loss component of LMP costs to serve GMP load & LMP revenues from GMP resources.	A	555	Marginal Loss Component - Little/no GMP control
Congestion	The congestion component of LMP costs to serve GMP load & LMP revenues from GMP resources	B	555	Can be partially hedged

	Additional description	Proposed PSA Component	FERC Account Number	Rationale
Emergency Purchases	Made by ISO-NE	A	555	
Emergency Sales	Made by ISO-NE	A	447	
ICAP/FCM Capacity (charges and credits)		A	555	
Reliability Must Run ("RMR") charges		A	555	
Load response	ISO-NE load response program	A	555	
Regulation		A	555	
DA NCPC Charges	Operating reserves	A	555, 447	Little/no GMP control
DA NCPC Credits	Operating reserves	B	555	Matches costs when GMP units or joint-owned units are run for reliability and fuel expense appears as Component B. Non-GMP unit or joint-owned unit NCPC charges/credits will remain in Component A.
RT NCPC Charges	Operating reserves	A	555, 447	Little/no GMP control
RT NCPC Credits	Operating reserves	B	555	Matches costs when GMP units or joint-owned units are run for reliability and fuel expense appears as Component B. Non-GMP unit or joint-owned unit NCPC charges/credits will remain in Component A.
Forward Reserve Credits/Charges	Operating reserves	A	555	
Synchronous Condenser credits/charges	Operating reserves	A	555	
Cancelled Starts	Operating reserves	A	555	
OR Resources available in DA not dispatched in RT	Operating reserves	A	555	
DA NCPC credits for dispatchable load pumps	Operating reserves	A	555	
RT NCPC credits for dispatchable load pumps	Operating reserves	A	555	
NCPC credits for resources postured for reliability	Operating reserves	B	555, 447	Matches costs when GMP units or joint-owned units are run for reliability and fuel expense appears as Component B. Non-GMP unit or joint-owned unit NCPC charges/credits will remain in Component A.
Special Constraint Resource charges/credits	Operating reserves	B	555, 447	Matches costs when GMP units or joint-owned units are run for reliability and fuel expense appears as Component B. Non-GMP unit or joint-owned unit NCPC

	Additional description	Proposed PSA Component	FERC Account Number	Rationale
				charges/credits will remain in Component A.
FTR/ARR				
LT On Peak ARR Credit	Revenues From FTR Auctions	A	555	Little/no GMP control
Monthly On Peak ARR Credit	Revenues From FTR Auctions	A	555	" "
LT Off Peak ARR Credit	Revenues From FTR Auctions	A	555	" "
Monthly Off Peak ARR Credit	Revenues From FTR Auctions	A	555	" "
FTR Auction Credits/Charges	Cost of FTR's in auction	B	555	Used to hedge congestion costs
Monthly FTR Congestion Credits/Charges	monthly congestion revenue paid to FTR holders	B	555	" "
Negative Congestion Adjustment	Charge if FTR congestion revenue is negative	A	555	Little/no GMP control
Annual FTR Adjustments	Disbursement of Excess FTR congestion revenue	B	555	only paid to FTR holders
NEPOOL GIS Fees	GIS transaction fees, and GMP share of NEPOOL GIS overhead costs.	A	555	
GLOBALFOUNDRIES (GF) SELF-MANAGED UTILITY	Transition Fee subject to PUC approval	A	456	Aligns with of GF's current retail revenue treatment

Excluded from the Power Adjustor:

Transmission for Others (this is mostly subtransmission service for VT utilities)

Quarterly Illustration of Retail Revenue Adjustor and Power Supply Adjustor

Assumptions used in the illustration below:

- 1.) Actual retail sales are lower than forecast by 10,000 MWh, and \$1.4 million.
- 2.) GMP therefore avoids purchasing that 10,000 MWh on spot market at an average of \$30/MWh. The net of other Component B costs & revenues is assumed equal to benchmark levels.
- 3.) Actual Component A costs come in \$3 million lower than the benchmark.
- 5.) GF remains part of retail sales through FY26, at PPA rate as set forth in PUC Petition, not including separate fixed transition payments booked separately.
- 4.) Benchmark values used below are illustrative only.

Step 1: Raw Variances in Revenue & Costs

	<u>Actual</u>	<u>Benchmark</u>	<u>Variance</u>	<u>Notes</u>
Revenue	\$162,600,000	\$164,000,000	-\$1,400,000	Per Assumption #1 above
Component A	\$38,500,000	\$41,500,000	-\$3,000,000	Per Assumption #3 above
Component B	\$58,700,000	\$59,000,000	-\$300,000	Per Assumption #2 above

Step 2: Cost Variance calculation and bandwidths

	<u>Actual</u>	<u>Benchmark</u>	<u>Variance</u>	
Retail Sales in kWh	1,102,000,000	1,112,000,000	-10,000,000	Per Assumption #1
Component B Cost per kWh	\$0.0533	\$0.0531	\$0.0002	Actual Component B costs per kWh were slightly higher than benchmark
Component B Cost Variance:	\$230,576			Variance in Component B costs per kWh times actual retail sales
Amount GMP (absorbs)/keeps:	-\$230,576			+\$150 K / (\$307 K) Efficiency Band and incremental 10% thereafter. In this example, GMP absorbs about \$231 K of cost increase
Component B Adjusted for Cost Variance	-\$530,576			(\$300,000) raw Component B variance, plus about \$231 K of cost variance absorbed by GMP

Step 3: Calculation of Retail Revenue Adjustor and Power Adjustor

Retail Revenue Adjustor:	\$1,400,000	Collection from customers of \$1.4 million, offsetting the decline in retail sales
Component A:	-\$3,000,000	Actual Component A costs \$3 million below benchmark; full return to customers.
Component B:	-\$530,576	Actual Component B costs \$300k lower than benchmark; GMP also absorbs \$231 K of cost variance.
Power Supply Adjustor	-\$3,530,576	Total Power Adjustor (Component A + Cost-variance adjusted Component B)

Step 4: Net Retail Revenue Adjustor and Power Adjustor

Retail Revenue Adjustor:	\$1,400,000	Recovery from customers of \$1,400,000 due to lower retail sales.
Power Supply Adjustor:	-\$3,530,576	Return to customers
Net Adjustment*	-\$2,130,576	

*This amount to be netted against the Major Storm Adjustor and any amount used from the Major Storm Restoration Fund as may be approved by the PUC, and collected from or returned to customers in accordance with the methodology in Section VII of the New Plan

Attachment 6 Example ESAM Calculation ⁽¹⁾
 (all revenues/costs in \$000)

	Year 1 Benchmark	Year 1 Actual	Year 1 Allowed ROE 8.57%	Year 1 Ceiling Sharing Band ⁽²⁾	Year 1 Ceiling Efficiency Band ⁽²⁾	Year 1 Floor Efficiency Band ⁽²⁾	Year 1 Floor Sharing Band ⁽²⁾
ROE Range	8.57%	8.30%	8.57%	9.82%	9.07%	8.07%	7.07%
Total Retail Revenue	\$680,762	\$680,771	Revenue Required \$683,942	Revenue Required \$698,448	Revenue Required \$689,744	Revenue Required \$678,139	Revenue Required \$666,533
Total Expenses	\$542,360	\$545,530	\$545,530	\$545,530	\$545,530	\$545,530	\$545,530
Operating income	\$138,402	\$135,241	\$138,412	\$152,918	\$144,214	\$132,609	\$121,003
Interest	\$38,915	\$38,915	\$38,915	\$38,915	\$38,915	\$38,915	\$38,915
Net income pre-tax	\$99,487	\$96,326	\$99,497	\$114,003	\$105,299	\$93,694	\$82,088
Income tax	\$27,573	\$26,704	\$27,583	\$31,604	\$29,191	\$25,974	\$22,757
Net income	\$71,914	\$69,622	\$71,914	\$82,399	\$76,108	\$67,720	\$59,332
Equity Component of Rate base	\$838,822	\$838,822	\$838,822	\$838,822	\$838,822	\$838,822	\$838,822
Return on Equity	8.57%	8.30%	8.57%	9.82%	9.07%	8.07%	7.07%
Revenue Requirement	\$680,762		\$683,942	\$698,448	\$689,744	\$678,139	\$666,533

Earnings Sharing Bands	bps change	ROE Range	Revenue Requirement	Actual Retail Revenues	Sufficiency / (Deficiency)	Results
Sharing Band Ceiling	0.75%	9.82%	\$ 698,448	\$ 680,771	\$ (17,678)	Actual Revenues below Sharing Band Ceiling.
Efficiency Band Ceiling	0.50%	9.07%	\$ 689,744	\$ 680,771	\$ (8,973)	Actual Revenues below ESAM Efficiency Band Ceiling
Allowed	8.57%	8.57%	\$ 683,942	\$ 680,771	\$ (3,171)	Actual Revenues below Allowed Cost of Equity but in the Efficiency Band, 100% shortfall retained by Company
Efficiency Band Floor	-0.50%	8.07%	\$ 678,139	\$ 680,771	\$ 2,632	Actual Revenues above ESAM Efficiency Band Floor
Sharing Band Floor	-1.00%	7.07%	\$ 666,533	\$ 680,771	\$ 14,238	Actual Revenues above Sharing Band Floor

In this illustrative example the total revenue deficiency is \$3,171. 100% of shortfall is within the ESAM Efficiency Band (\$683,942-\$678,139), so GMP will absorb 100% of the shortfall, \$3,171.

⁽¹⁾ Example is based on GMP's filed FY 2022 Base Rate Refresh.

⁽²⁾ Revenue sufficiency within the Sharing Band above the Efficiency Band Ceiling is shared 75% to customers and 25% to GMP and revenue sufficiency above the Sharing Band Ceiling is 100% to customers. Revenue deficiency within the Sharing Band below the Efficiency Band Floor is shared 50% to customers and 50% to GMP and revenue deficiency below the Sharing Band Floor is 100% to customers.

GMP Innovation and Performance Metric Report
Performance Metrics Report

Category	Metric #	Metric	Measurement Period	FY23 (10/1/22-9/30/23)	FY24 (10/1/23-9/30/24)	FY25 (10/1/24-9/30/25)	FY26 (10/1/25-9/30/26)	Trend	
Capital Expenses	1	Total amount of capital spending	FY						
	2	Total amount of capital spending closed to plant	FY						
	3	Any exceptions to capital spending thresholds sought by GMP	FY						
Exogenous Costs	4	Total amount of exogenous storms costs	FY						
	5	GMP's power supply emissions profile (lbs CO2/kWh delivered)	CY						
Power Portfolio	6a	Percent of GMP's power supply that is carbon-free	CY						
	6b	Percent of GMP's power supply that is renewable energy (as defined under 30 V.S.A. § 8002(21))	CY						
	7a	Annual ISO Peak	CY						
	7b	GMP coincident load for ISO Peak	CY						
	7c	Winter peak - Vermont	CY						
	7d	GMP coincident load for Vermont winter peak	CY						
	7e	Summer peak - Vermont	CY						
	7f	GMP coincident load for Vermont summer peak	CY						
Distributed Generation	8	Total number and capacity of DG facilities interconnected to GMP's system	Cumulative through CY						
	9a		<=15 kW	CY					
	9b	Aggregate capacity of DG facilities interconnected to GMP's system in the prior calendar year	>15, <=150 kW	CY					
	9c		>150, <=500 kW	CY					
	9d		>500 kW	CY					
	10a		<=15 kW	CY					
	10b	Total number of third-party DG resources interconnected to GMP's system in the prior calendar year	>15, <=150 kW	CY					
	10c		>150, <=500 kW	CY					
	10d		>500 kW	CY					
	11a	Total number and aggregate capacity of systems currently waiting for interconnection to GMP's system but unable to do so as a result of capacity constraints on GMP system	<=15 kW	FY					
	11b		>15, <=150 kW	FY					
	11c		>150, <=500 kW	FY					
	11d		>500 kW	FY					
	12	Listing of pending interconnection requests, cost estimate of GMP upgrades for each request, current status of each request*		CY					
	13a		<=15 kW	FY					
	13b	Estimated average days to interconnect DG systems (from point project is ready for physical interconnection)	>15, <=150 kW	FY					
	13c		>150, <=500 kW	FY					
	13d		>500 kW	FY					
	14a		<=15 kW	FY					
	14b	Estimated longest duration for interconnecting DG facility (from point project is ready for physical interconnection)	>15, <=150 kW	FY					
14c		>150, <=500 kW	FY						
14d		>500 kW	FY						
15	Average interconnection cost for DG systems in the prior calendar year (aggregate)		CY						
15a		<=15 kW	CY						
15b	Average interconnection cost for DG systems in the prior calendar year by facility size	>15, <=150 kW	CY						
15c		>150, <=500 kW	CY						
15d		>500 kW	CY						
16	Percent of GMP circuits with TGF0V limitations		As of (CY End)						
16a		>20%	As of (CY End)						
16b	Percent of substation transformers with capacity remaining	<20% but >10 %	As of (CY End)						
16c		<10 %	As of (CY End)						
Distributed Energy Resources (DER)*	17a	Percent of GMP load subject to dynamic curtailment or interruption	Cumulative through end of FY						
	17b	Percent of GMP load with shared access by GMP directly or through aggregators	Cumulative through end of FY						
	18	Total number and aggregate MW capacity of behind-the-meter DERs connected to GMP shared access platform	Cumulative through end of CY						
	19	Capacity of DER fleet that is on an incentive rate	Cumulative through end of FY						
	20	Capacity of behind the meter DERs resources installed by third party suppliers connected to a GMP shared access platform	FY						
	20a	Combined hours of backup provided by batteries in customer homes during outage events	CY						
	21a	Number and capacity of storage systems connected to a GMP shared access platform	FY						
21b	Number of storage systems that are capable of islanding individual customers or groups of customers (to the extent known)	FY							
EV	22	Number of standalone Level 3 EV public charging stations interconnected (to extent known)	FY						
	22a	Percentages of GMP fleet procured and converted to electric for the FY and cumulative - broken down by full EV or hybrid/partial EV	FY and Cumulative through end of FY						
	23	Number of EV home chargers connected to GMP shared access platform	FY						
	24	Number of customers currently enrolled in EV charging rates or other relevant incentives through tariffs, pilot program, or other incentive programs	Cumulative through end of FY						
	25a	Number of make-ready requests for EV public charging stations that GMP is aware of in the past calendar year	FY						
25b	Estimated average GMP response time from request to interconnection	FY							
Other	26a	Percent of customers receiving eBills	Cumulative through end of FY						
	26b	Percent of customers remitting thru autodraft or recurring CC	Cumulative through end of FY						
	26c	Percent of customers with a GMP online account	Cumulative through end of FY						
	26d	Percent of customers enrolled in text alerts**	Cumulative through end of FY						
BYOD Storage Tariff Commitments (19-3537-1F)	27	Number of systems and total kW installed under BYOD	FY						
	28	Number of installers participating in BYOD	FY						
	29	Names of the installers (separate attachment)	FY						
	30	Battery type/size installed by manufacturer	FY						
	31	Number of monthly peaks during which discharge successfully occurred during the RNS peak and the total capacity available during discharge	FY						
	32	Whether the batteries were successfully discharged during the ISO New England annual forward capacity peak and the total capacity available during that discharge	FY						
	33	Financial savings from peak shaving actually achieved	FY						
34	Annual program costs of BYOD program	FY							
ESS Storage Tariff Commitments (19-3167-1F)	35	Number and capacity of systems that fail to respond to more than three discharge signals	FY						
	36	Number of systems and total kW installed under ESS Tariff	FY						
	37	Number of installers participating in ESS Tariff	FY						
	38	Names of the installers (separate attachment)	FY						
	39	Battery type/size installed by manufacturer	FY						
	40	Number of monthly peaks during which discharge successfully occurred during the RNS peak and the total capacity available during discharge	FY						
	41	Whether the batteries were successfully discharged during the ISO New England annual forward capacity peak and the total capacity available during that discharge	FY						
42	Financial savings from peak shaving actually achieved	FY							
43	Total lease revenue	FY							
44	Any payments requested and/or received from Tesla under the performance guarantee	FY							
45	Annual program costs for ESS (including cost to service debt and equity associated with the investments for the ESS Tariff)	FY							
46	Number and capacity of systems defaulting on lease payments	FY							
47	Number and capacity of systems that fail to respond to more than three discharge signals	FY							
Low/Moderate Income Access***	48	Percent of new GMP programs with feature targeted at LMI customer availability	FY						
	49	Year over year increase in number of customers utilizing LMI rebates/Tier 3	FY						

* (not including solar PV systems)

** Statutes include:

- 1) in Fast Track Screening;
- 2) in Feasibility Study process (if requested);
- 3) in System Impact Study process;
- 4) in Facilities Study process;
- 5) Interconnection Agreement provided to generator;
- 6) interconnection agreement fully executed;
- 7) project online

***Note: this data reflects % of accounts with text alert enrollment, not total enrolled users; some accounts may have more than one enrolled user (e.g. family members in same household both receiving outage alerts)

***LMI to be defined as 185% of the federal poverty level

Green Mountain Power
FY 2023 - 2026 Multi-Year Regulation Plan

Expected Filings	Rate Period	Measurement Period	Filing Date	Rates Effective	Review	DPS Review and PUC Approval
Annual Base Rate Filing			GMP shall provide to the DPS the retail revenue forecast and the power supply forecast upon completion and at least 30 days prior to GMP's FY 2024 - FY 2026 Annual Base Rate Filing Date shown below.		Subject to DPS Review & PUC Approval	The Commission's Order in the FY23 Traditional Rate Case shall set the FY23 Initial Base Rate. The proposed Annual Base Rate filings thereafter shall be subject to DPS review and comment (including independent expert review, as needed), and PUC approval. The Department shall file comments on GMP's Annual Base Rate Filings within 60 days of the filing. Final rates for the coming fiscal year shall be set by the PUC no less than 30 days prior to the start of the fiscal year. The Annual Base Rate Filing shall be posted on GMP's website at the time of filing, and GMP shall provide individual customer notice through bill notification of each Plan period's Base Rate Annual Adjustment when its request to effectuate those changes is filed.
FY 2023 Traditional Base Rate Filing	FY 2023	NA	No later than 1/15/2022	1-Oct-22		Review Complete per Rate Case Schedule PUC Approval: Sep 30, 2022
FY 2024 Base Rate Filing ¹⁾	FY 2024	NA	1-Jun-2023	1-Oct-23		Review Complete: Aug 1, 2023 PUC Approval: Sep 1, 2023
FY 2025 Base Rate Filing	FY 2025	NA	1-Jun-2024	1-Oct-24		Review Complete: Aug 1, 2024 PUC Approval: Sep 1, 2024
FY 2026 Base Rate Filing	FY 2026	NA	1-Jun-2025	1-Oct-25		Review Complete: Aug 1, 2025 PUC Approval: Sep 1, 2025
¹⁾ Among other requirements, the FY 2024 base rate filing will include an update on any New Initiative spending carry over from FY22 to FY23 as addressed in Section VIII(G) of the New Plan.						
FY 2023 - 2026 Retail Revenue, Power Supply and Major Storm Adjustors			Collection or Refund will be over the remaining term of the Plan or a 12 month period, whichever is longer, on a bills rendered basis, unless otherwise requested or ordered by the Commission. Effective start date to be the second quarter after the triggering- event quarter.		Subject to DPS Review & PUC Approval	For each measurement quarter, the quarterly retail revenue and power supply variance amounts and the quarterly qualified major storm amount will be netted into the 'Quarterly Net Adjustment'. Within 30 days of the end of each quarter, GMP shall file a report summarizing the results of the quarter, along with the net amount to be returned to or collected from customers, if any. Triggering Event for refund or collection of the Quarterly Net Adjustment is when the current measurement quarter is in the same direction as the Quarterly Net Adjustment from the prior measurement quarter and the prior quarter cumulative carry forward is greater than +/- \$1M, then the prior quarter cumulative carry forward will be collected from or returned to customers. The Quarterly Net Adjustment will appear as a separate line item ("Current Energy/Major Storm Adjustor") on customer bills.
Retail Revenue, Power Supply and Major Storm Adjustor	Q1	Oct 1 - Dec 31	Jan 30	TBD		Quarterly Adjustor Review Complete: Mar 1
Retail Revenue, Power Supply and Major Storm Adjustor	Q2	Jan 1 - Mar 31	Apr 30	TBD		Quarterly Adjustor Review Complete: May 30
Retail Revenue, Power Supply and Major Storm Adjustor	Q3	Apr 1 - Jun 30	Jul 30	TBD		Quarterly Adjustor Review Complete: Aug 30
Retail Revenue, Power Supply and Major Storm Adjustor	Q4	Jul 1 - Sep 30	Oct 30	TBD		Quarterly Adjustor Review Complete: Nov 30
FY 2023 - 2026 Annual Exogenous Non-Storm Change Adjustor					Subject to DPS Review & PUC Approval	Within 60 days after the end of each measurement period, the calculation associated with the Exogenous Non-Storm Change Adjustor shall be filed and subject to review and comment by the Department. The Commission shall approve the proposed adjustments no later than 45 days prior to April 1 of the following year so that the Exogenous Non-Storm Change adjustor can be reflected as a separate line item on customers bills for the ensuing 12 months, unless otherwise ordered by the Commission. GMP shall provide individual customer notice through bill notification 30 days prior to start of adjustment.
FY 2023 Exogenous Non-Storm Change Filing	FY 2023	Oct 1 2022 - Sep 30, 2023	29-Nov-2023	1-Apr-24		PUC Approval: Feb 15, 2024
FY 2024 Exogenous Non-Storm Change Filing	FY 2024	Oct 1 2023 - Sep 30, 2024	29-Nov-2024	1-Apr-25		PUC Approval: Feb 15, 2025
FY 2025 Exogenous Non-Storm Change Filing	FY 2025	Oct 1 2024 - Sep 30, 2025	29-Nov-2025	1-Apr-26		PUC Approval: Feb 15, 2026
FY 2026 Exogenous Non-Storm Change Filing	FY 2026	Oct 1 2025 - Sep 30, 2026	29-Nov-2026	1-Apr-27		PUC Approval: Feb 15, 2027
FY 2023 - 2026 Annual Earnings Sharing Adjustor Mechanism "ESAM"					Subject to DPS Review & PUC Approval	The Company's rates will be subject to an Earnings Sharing Adjustor for each rate period during the Plan term. No later than 60 days after the end of each fiscal year ("ESAM Measurement Period"), the Company shall file with the Commission and Department it's actual earnings for the ESAM Measurement Period, the proposed Earnings Sharing Adjustor calculation and supporting information. The Commission shall approve the proposed adjustment no later than 45 days prior to April 1 of the following year, so that the Earnings Sharing Adjustor amount can be reflected as a separate line item on customers bills for the ensuing 12 months, unless otherwise ordered by the Commission, commencing April 1 of each year.
FY 2023 ESAM Filing	FY 2023	Oct 1 2022 - Sep 30, 2023	29-Nov-2023	1-Apr-24		PUC Approval: Feb 15, 2024
FY 2024 ESAM Filing	FY 2024	Oct 1 2023 - Sep 30, 2024	29-Nov-2024	1-Apr-25		PUC Approval: Feb 15, 2025
FY 2025 ESAM Filing	FY 2025	Oct 1 2024 - Sep 30, 2025	29-Nov-2025	1-Apr-26		PUC Approval: Feb 15, 2026

**Green Mountain Power
FY 2023 - 2026 Multi-Year Regulation Plan**

Expected Filings	Rate Period	Measurement Period	Filing Date	Rates Effective	Review	DPS Review and PUC Approval
FY 2026 ESAM Filing	FY 2026	Oct 1 2025 - Sep 30, 2026	29-Nov-2026	1-Apr-27		PUC Approval: Feb 15, 2027
FY 2023 - 2026 Annual Plan Evaluation and Performance Metrics						Beginning January 30, 2024 and each year thereafter under the Plan, the Company shall measure and annually report on the Innovation and Performance Metrics identified in Attachment 7. Metrics shall be measured on a fiscal year basis except where otherwise indicated on the Attachment. At the same time, the Company will file a brief narrative evaluation of the effectiveness of the Plan's performance.
FY 2023 Annual Plan Evaluation & Performance Metric Report	FY 2023	Oct 1 2022 - Sep 30, 2023	30-Jan-2024			
FY 2024 Annual Plan Evaluation & Performance Metric Report	FY 2024	Oct 1 2023 - Sep 30, 2024	30-Jan-2025			
FY 2025 Annual Plan Evaluation & Performance Metric Report	FY 2025	Oct 1 2024 - Sep 30, 2025	30-Jan-2026			
FY 2026 Annual Plan Evaluation & Performance Metric Report	FY 2026	Oct 1 2025 - Sep 30, 2026	30-Jan-2027			
FY 2023 - 2026 Benchmark Report						The Company will file an annual Benchmark Report by June 1 for the preceding calendar year. Report will be prepared using annual calendar year FERC Form 1s.
CY 2023 Benchmark Report		Jan 1 2023 - Dec 31, 2023	1-Jun-2024			
CY 2024 Benchmark Report		Jan 1 2024 - Dec 31, 2024	1-Jun-2025			
CY 2025 Benchmark Report		Jan 1 2025 - Dec 31, 2025	1-Jun-2026			
CY 2026 Benchmark Report		Jan 1 2026 - Dec 31, 2026	1-Jun-2027			
NOTE: Filing Dates Under Current Regulation Plan					Subject to DPS Review & PUC Approval	Within 60 days after the end of each measurement period, calculations associated with the Earnings Sharing Adjustor, Merger Savings Report and Emerald Ash Borer Adjustor shall be filed and subject to review and comment by the Department.
FY 2022 Merger Savings Report	FY 2022	Oct 1 2021 - Sep 30, 2022	29-Nov-2022	Per Commission Order		
FY 2022 Emerald Ash Borer Annual Report	FY 2022	Oct 1 2021 - Sep 30, 2022	29-Nov-2022	Per Commission Order		
FY 2022 ESAM Filing	FY 2022	Oct 1 2021 - Sep 30, 2022	29-Nov-2022	1-Apr-23		PUC Approval: Feb 15, 2023
Filing Dates For New Regulation Plan					Subject to DPS Review & PUC Approval	GMP will file a report on the benefits of continuing the New Plan no later than November 30, 2024. Any proposal for a Successor Plan will be filed no later than thirteen months prior to the proposed effective date.
Report on Benefits of Continuing New Plan		NA	30-Nov-24			
Successor Regulation Plan	TBD	TBD	Thirteen months prior to proposed effective date			

Green Mountain Power
FY23-FY26 Multi-Year Regulation Plan, Attachment 9

Example GMP Annual Benchmark Report (Using 2020 Data)

Peer Group Ferc Ref	State State(s)	2020 \$\$\$ per Customer	Transmission of				Distribution p. 322, ln 156	Customer Srvc	Customer Srvc	Customer Srvc	Total Customer Service Related Col (l) + (m) + (n)
			Transmission Expense p. 321, ln 112	Electricity by Others p. 321, ln 96	Total Trans Exp less TBO Col (h) - (i)	Total Customer Accounts p. 322, ln 164		Total Cust Svc & Info Expense p. 323, ln 171	Total Sales Expense p. 323, ln 178		
Granite State Electric Co (Liberty Utilities)	NH	\$310	\$ 25,405,283	\$ 24,841,129	\$ 564,154	\$ 7,184,175	\$ 1,722,378	\$ 100,090	\$ 192,485	\$ 2,014,953	
Versant (Emera Maine/Bangor Hydro/ME Pub Serv) ***	Maine	\$339	\$ (370,780)	\$ (6,398,159)	\$ 6,027,379	\$ 25,633,384	\$ 9,907,697	\$ 119,633	\$ -	\$ 10,027,330	
Green Mountain Power	VT	\$378	\$ 110,570,830	\$ 102,989,127	\$ 7,581,703	\$ 40,633,102	\$ 8,129,933	\$ 2,430,026	\$ 8,546	\$ 10,568,505	
MDU Resources (Montana-Dakota Utilities Co)	Mont/Dak/WY	\$392	\$ 36,548,814	\$ 26,521,141	\$ 10,027,673	\$ 15,832,108	\$ 4,302,674	\$ 339,895	\$ 149,912	\$ 4,792,481	
Unitil Energy Systems, Inc.	NH	\$393	\$ 35,383,792	\$ 34,965,017	\$ 418,775	\$ 9,544,759	\$ 4,286,916	\$ 7,326,955	\$ 92,237	\$ 11,706,108	
Northern States Power Co (WI)	Wis	\$397	\$ 67,748,013	\$ 55,480,749	\$ 12,267,264	\$ 22,662,341	\$ 9,649,012	\$ 12,369,137	\$ 143,376	\$ 22,161,525	
Central Maine Power Company	Maine	\$423	\$ 208,827,550	\$ 187,911,730	\$ 20,915,820	\$ 103,233,056	\$ 47,873,609	\$ 28,897,371	\$ 1,392,202	\$ 78,163,182	
Madison Gas & Electric	Wis	\$427	\$ 38,565,605	\$ 38,543,356	\$ 22,249	\$ 16,075,222	\$ 7,199,495	\$ 9,511,900	\$ 326,836	\$ 17,038,231	
Public Service Company of New Hampshire	NH	\$477	\$ 46,173,609	\$ 26,221,651	\$ 19,951,958	\$ 88,274,206	\$ 27,047,915	\$ 41,323,319	\$ (140)	\$ 68,371,094	
Delmarva Power & Light Company	Maryland	\$545	\$ 23,627,022	\$ 3,381,656	\$ 20,245,366	\$ 106,365,708	\$ 59,544,617	\$ 8,535,139	\$ -	\$ 68,079,756	
Rochester Gas & Electric	NY	\$550	\$ 8,045,856	\$ 319,896	\$ 7,725,960	\$ 77,500,080	\$ 37,399,284	\$ 48,695,654	\$ 4,519,110	\$ 90,614,048	
The Empire District Electric Co.	Ark	\$580	\$ 24,237,945	\$ 18,419,514	\$ 5,818,431	\$ 22,266,629	\$ 9,717,695	\$ 4,686,917	\$ 75,095	\$ 14,479,707	
Upper Peninsula Power Co	Mich	\$599	\$ 8,382,512	\$ 8,486,768	\$ (104,256)	\$ 13,672,536	\$ 3,301,212	\$ 3,254,339	\$ -	\$ 6,555,551	
Fitchburg Gas & Electric	Mass	\$634	\$ 10,062,966	\$ 9,457,529	\$ 605,437	\$ 4,432,500	\$ 3,701,341	\$ 4,552,869	\$ 48,448	\$ 8,302,658	
The United Illuminating Co	CT	\$768	\$ 146,771,839	\$ 107,283,008	\$ 39,488,831	\$ 98,847,872	\$ 41,522,630	\$ 44,819,217	\$ -	\$ 86,341,847	
Otter Tail	Minn, Dak	\$769	\$ 28,263,103	\$ 18,537,209	\$ 9,725,894	\$ 17,070,455	\$ 15,030,388	\$ 12,509,934	\$ 211,509	\$ 27,751,831	
Black Hills Power, Inc.	SD	\$793	\$ 27,933,063	\$ 22,919,417	\$ 5,013,646	\$ 15,226,792	\$ 2,468,761	\$ 474,031	\$ 76,545	\$ 3,019,337	
Rockland Electric Company	NJ	\$801	\$ 2,771,681	\$ -	\$ 2,771,681	\$ 18,478,766	\$ 6,775,383	\$ 8,837,854	\$ 827	\$ 15,614,064	
Allete	Minn	\$828	\$ 86,985,355	\$ 65,105,566	\$ 21,879,789	\$ 20,234,759	\$ 6,364,198	\$ 6,253,074	\$ 26,136	\$ 12,643,408	
CH Energy (Central Hudson)	NY	\$951	\$ 12,989,986	\$ 2,192,074	\$ 10,797,912	\$ 76,559,288	\$ 26,331,392	\$ 52,360,757	\$ 708	\$ 78,692,857	

*** Versant purchased Emera and Maine Public Service.

Note: Example only; peer group may change from year to year depending on mergers, acquisitions, or other relevant company changes.

Zero Outages Initiative Regulatory Accounting Procedure

During the term of GMP's existing Regulation Plan, Zero Outages Initiative projects will be developed, reviewed, and proposed for inclusion in GMP's rates in the manner outlined below.

GMP is proposing Zero Outages Initiative work as an unexpected or strategic capital exception Section IV(A)(6) of the Regulation Plan but will not seek to include any such project in base rates in effect during the term of the Regulation Plan until completed and recorded to plant in service.

To implement this approach GMP will track and report Zero Outages Initiative related capital investments separately from already authorized Regulation Plan capital using the following procedure. The Department of Public Service ("DPS") will have the opportunity to review and comment on completed Zero Outages Initiative projects ("Zero Outages Projects") in each annual base rate filing under the Regulation Plan, and no amounts associated with such work will be incorporated into base rates until reviewed and approved by the Public Utility Commission ("PUC" or "Commission").

1. **Zero Outages Project Work:**

- (a) During the term of the Regulation Plan Zero Outages Projects will be prioritized and selected each year in order to improve resiliency for customers. Zero Outage projects may consist of both capital and Operations & Maintenance (O&M) projects.
- (b) GMP will pursue priority Zero Outages Projects in each fiscal year, commencing and completing as many projects as possible given resource availability, but will not seek to recover through rates the cost of any of the proposed Zero Outages Projects until after the capital project is completed and recorded to plant in service or the O&M cost has actually been expended.
- (c) For each Zero Outages Project GMP will continue to follow the capital documentation standards outlined in GMP's Memorandum of Understanding with the Department of Public Service and approved by the Commission in Case No. 17-3112-INV (Exhibit #2 to DPS/GMP MOU).
- (d) During construction, Zero Outages Projects will follow GMP's capitalization and AFUDC policies.
- (e) GMP will separately track the incremental O&M and capital project costs, associated with Zero Outages Projects, including accumulated deferred income taxes, plant depreciation expense, property taxes, and incremental O&M costs.

2. Zero Outages Initiative Regulatory Assets:

- (a) For Zero Outages Projects, GMP will record to a regulatory asset for future recovery the depreciation, property taxes, interest and equity return, and other project costs between the time a project was completed and recorded to plant in service and when it is included in rate base in a rate filing.
- (b) GMP will record to the regulatory asset incurred O&M project costs for Zero Outages Projects that have not been included in the cost of service of a base rate filing.
- (c) GMP will accrue a return on this regulatory asset, excluding the deferred debt and equity components of the regulatory asset, but defer collection until the Commission specifically approves including such Zero Outages Projects in base rates.
- (d) The regulatory asset will be included in a future Annual Base Rate filing, or the follow-on traditional rate case rates at the end of the Regulation Plan proceeding, for Commission review and approval.
- (e) GMP will propose an amortization period for recovery of the Zero Outages Initiative regulatory assets at the time it seeks Commission approval to include the regulatory assets in rates.

3. Zero Outages Initiative Base Rate Filings:

- (a) GMP will track both capital costs and O&M expenses for Zero Outages Projects in a manner that allows the impacts of those activities to be segregated from other capital spending or O&M costs and separately reported in the Annual Base Rate Filing on June 1st of each year during the Regulation Plan period.
- (b) Each Annual Base Rate Filing will provide a summary of the completed Zero Outages Projects GMP's seeks to include in base rates. **Appendix 1** is an example of the summary form that will be used to identify and describe each proposed project.
- (c) The overall cost associated with Zero Outages Projects will be summarized and separately identified in the lead schedules for each Base Rate Filing. **Appendix 2** is an example of the Regulation Plan Annual Base Rate Filing lead schedules which shows how both capital and O&M-related amounts for Zero Outages Projects will be presented in this filing.
- (d) Zero Outages Projects will be filed with Annual Base Rate filings on the following schedule:
 - 1. Zero Outages Projects completed after the date the Zero Outages Initiative is approved. through March 31, 2025, will be included in GMP's June 1, 2025 Annual Base Rate Filing, for proposed inclusion in FY26 base rates.

2. Zero Outages Projects completed between April 1, 2025 and September 30, 2025 will be included in GMP subsequent traditional base rate case, anticipated to be filed in January of 2026, for FY27 base rates.
3. Zero Outages Projects completed between October 1, 2025 and September 30, 2026 will be included in the next base rate under any future regulation plan, as may be ordered by the Commission.

(e) The amounts approved by the Commission will be incorporated into the subsequent base rate change consistent with the recovery schedule approved by the Commission, and will go into effect October 1st of that year (i.e. capital and O&M amounts for Zero Outages Projects submitted for Commission approval June 1, 2025 and approved by the Commission will be incorporated into the October 1, 2026 base rate change.)

4. Zero Outages Projects - Impact on Power Supply Expense:

Zero Outages Projects are expected to have little impact on power supply expense during the existing Regulation Plan, and any direct and indirect impacts on power costs that do occur, for example through the expansion of storage, will be captured as part of the annual refresh of power cost and any variance to the actual impacts captured in the Power Supply Adjustor.

5. Zero Outages Projects Capital Structure Implications:

GMP will fund the Zero Outages Initiative work consistent with its existing capital structure of 50% debt, 50% equity. In the event investments require a change in total debt costs, GMP will use the methodology provided in Section IV(A)(3) of the Regulation Plan to update debt costs associated with any approved Zero Outages Projects. GMP will propose any modifications in associated debt costs at the time of the annual base rate that seeks approval to add any Zero Outages Projects to rate base.

6. Overall Timeline for ZOI and Other Related GMP Regulatory Filings:

Filing	Rate Period	Measurement Period	Filing Date	Rates Effective	Review/Approval Status
2024 GMP IRP	--	--	10-Dec-24	--	Will include ZOI status and integration into IRP; IRP is subject to DPS review and PUC approval
ZOI data included in MYRP annual metrics report	FY24	Data on ZOI projects completed before relevant date	30-Jan-25	--	All annual metrics reports, including ZOI data, will be reviewed
ZOI Report in Annual Base Rate Filing	FY26	All completed projects closed to plant from ZOI approval date through 3/31/25	1-Jun-25	1-Oct-25	Subject to DPS review/PUC approval
Proposed GMP successor MYRP	FY27-TBD	Will include proposal for integrating ZOI Phase 2	1-Sept-25	1-Oct-26	Subject to DPS review/PUC approval
Traditional Base Rate Filing incl. ZOI report	FY27	All completed projects closed to plant from 4/1/25 through 9/30/25	15-Jan-26	1-Oct-26	Subject to DPS review/PUC approval
ZOI data included in MYRP annual metrics report	FY25	Data on ZOI projects completed before relevant date	30-Jan-26	--	All annual metrics reports, including ZOI data, will be reviewed
ZOI data included in MYRP annual metrics report	FY26	Data on ZOI projects completed before relevant date	30-Jan-27	--	All annual metrics reports, including ZOI data, will be reviewed
Future Annual Base Rates and ZOI Reports	--	As ordered by PUC	1-Jun-27 or as ordered	1-Oct-27 or as ordered	Subject to DPS review/PUC approval

Exhibit GMP-LD-1 (Appendix 2)
Example COS Base Rate Summary
Fiscal 20xx Base Rate Filing

Schedule C*

COST OF SERVICE Base Rate Results

\$ in 000s, rounding results in minor differences between schedules

	<u>Test Year</u> <u>Fiscal 20xx</u>	<u>Adjustments</u>	<u>Rate Year</u> <u>Fiscal 20xx</u>	<u>Zero Outages</u> <u>Adjustments</u> <u>Fiscal 20xx</u>	<u>BroadBand</u> <u>Adjustments</u> <u>Fiscal 20xx</u>	<u>Total Cost</u> <u>of Service</u> <u>Fiscal 20xx</u>
Purchased Power, Net	-	-	-	-	-	-
Production	-	-	-	-	-	-
Transmission	-	-	-	-	-	-
Power Supply - Other	-	-	-	-	-	-
Transmission - Other	-	-	-	-	-	-
Distribution	-	-	-	-	-	-
Customer Accounting, excluding Uncollectible Expense	-	-	-	-	-	-
Customer Service and Information	-	-	-	-	-	-
Sales	-	-	-	-	-	-
Administrative and General	-	-	-	-	-	-
Capital Costs (Credit Facility Fees and Return on REC Inventory)	-	-	-	-	-	-
Other Taxes, excluding Revenue Taxes	-	-	-	-	-	-
Municipal Taxes	-	-	-	-	-	-
Plant Depreciation	-	-	-	-	-	-
Accretion Expense	-	-	-	-	-	-
Regulatory Amortizations	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Total Non-PSA O&M Expenses	-	-	-	-	-	-
Taxes - Federal and State	-	-	-	-	-	-
Return on Utility Rate Base	-	-	-	-	-	-
Total Cost of Service Before Credits	-	-	-	-	-	-
Less:						
Equity in Earnings of Affiliates	-	-	-	-	-	-
Other Operating Revenues	-	-	-	-	-	-
Business Development, Net	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Total Fixed Cost of Service Credits	-	-	-	-	-	-
Cost of Service to Ultimate Consumers	-	-	-	-	-	-
Gross Revenue & Fuel Gross Receipts Taxes	-	-	-	-	-	-
Uncollectible Expense - Rate Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Total Cost of Service to Ultimate Consumers	-	-	-	-	-	-
Revenue from Ultimate Consumers	-	-	-	-	-	-
Revenue Deficiency/(Sufficiency) from Ultimate Consumers			-	-	-	-
Revenue from Ultimate Consumers, less PPA revenue from GF			-	-	-	-
Base Rate Revenue Adjustment Percent			0.00%	0.00%	0.00%	0.00%

*Further details on each line item are included on the Cost of Service Adj Detail Sheet and in the numbered sub-schedules

Exhibit GMP-LD-1 (Appendix 2)

**Example Rate Base Summary
Fiscal 20xx Base Rate Filing**

Schedule D*

RATE BASE Balances

\$ in 000s, rounding results in minor differences between schedules

		<u>Test Year Fiscal 20xx</u>	<u>Adjustments</u>	<u>Rate Year Fiscal 20xx</u>	<u>Zero Outages Adjustments Fiscal 20xx</u>	<u>BroadBand of Service Fiscal 20xx</u>	<u>Total Rate Base Fiscal 20xx</u>
D1-4	Subtotal Utility Plant in Service	-	-	-	-	-	-
D-5	Construction Work in Progress	-	-	-	-	-	-
D-6	Investment in Affiliates	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
	Special Deposits	-	-	-	-	-	-
D-8	Unamortized Debt Discount and Expense	-	-	-	-	-	-
D-7	Community Energy & Efficiency Development Fund	-	-	-	-	-	-
D-9	Regulatory Assets and Deferred Debits	-	-	-	-	-	-
	Tax ASC 740	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-
D-10	Working Capital Allowance:	-	-	-	-	-	-
	Rate base Deductions						
D-11	ACCUMULATED DEPRECIATION/AMORT.	-	-	-	-	-	-
D-12	Customer Advances for Construction	-	-	-	-	-	-
D-13	Accumulated Deferred Income Taxes and Tax Reform Reg Liabili	-	-	-	-	-	-
D-14	Accumulated Deferred Investment Tax Credits	-	-	-	-	-	-
D-15	Regulatory Liabilities	-	-	-	-	-	-
D-16	Accrued Pension Expense	-	-	-	-	-	-
D-17	Acc. Post-Ret. Medical Expense	-	-	-	-	-	-
	Acc. Other Post-Employment Ben. Exp.	-	-	-	-	-	-
	SERP	-	-	-	-	-	-
	Deferred Comp	-	-	-	-	-	-
	Subtotal Rate base Deductions	-	-	-	-	-	-
	TOTAL RATEBASE INVESTMENT	-	-	-	-	-	-

* Further details on each line item are included in the numbered sub-schedules referenced in this column