

PC Data Request 117

Re: Insurance Expense Adjustment/Legal Expense.

Please refer to the Rebuttal Testimony of Natasha C. Siores at page 9, lines 5 through 8. Please explain, in detail, why “[i]t was the Company’s intent to exclude all costs related to the Wood Hollow fire in this case.” Also, please explain, in detail, why the reason for removing all costs associated with the Wood Hollow fire would not be similarly applicable to the two incidents discussed on page 7 of Ms. Siores Rebuttal Testimony, lines 14 through 19.

Response to PC Data Request 117

The Company elected to remove the Wood Hollow fire costs from the filing because the fire is currently the subject of ongoing litigation that makes the total costs attributable to this fire not known and measurable at this time. The Company therefore has not sought recovery of these costs in any of its state jurisdictions. In contrast, the other two incidents discussed on page 7 of Ms. Siores Rebuttal Testimony, lines 14 through 19, involve known and measurable costs.

PREPARER: Jim Nelson

SPONSOR: TBD