**Central Maine Power Company (CMP)**

**2023 ISO New England Inc. Transmission, Markets and Services Tariff**

**Docket No. ER20-2054**

**Office of Public Advocate (OMPA)**

**Data/Information Request No. 1**

**September 1, 2023**

**OMPA-CMP-1-7**

**Q:** Please refer to MPUC 1-32 – Attachment 1 attached hereto.

1. Please provide the nature of the items marked with one asterisk (\*) (Line Nos. 1,11, 12, 13, 14, 15 and 22).
2. Please provide in detail the nature of the litigations marked with two asterisks (\*\*) (Line Nos. 3, 4, 5, 6, 7, 8, 9 and 10). Please provide the following information for each of the above listed litigations:
3. Current status
4. Amounts posted to Plaintiffs and their Counsels, if any.

c. Line 16 – Does this item include any expenses related to retail filings. If yes, please provide the amount and also indicate whatever it has been recovered as retail regulatory expenses.

d. Please provide the nature of the Governing Bodies and service provided by them.

e. Please provide the details of the services provided b the IUMC (Line 44). Also, please provide the total amount and the data used for the allocation to CMP Electric.

**A:**

1. Line 1 in MPUC-CMP-1-32 Attachment 1, SEC-Guards CMP is security guard expenses for security guards and security services at CMP's physical sites.

Lines 11-14 in MPUC-CMP-1-32 Attachment 1, CMP Brand services are described as follows:

Line 11 Craft & Commerce – CMP engaged Craft & Commerce to assist with media advertising, planning and management. This helped CMP to deploy positive messaging delivered across local media channels including digital, television, print and radio, reinforcing CMP’s support for the communities it serves. CMP was better able to communicate and inform its support provided through the programs CMP participates in with multiple organizations, such as Mainers Make a Difference, Community Champions, Maine Public Holiday Programming, and a Toy Drive. This engagement supported advertising for venues such as a bus stop forecast, NBC storm center, Maine good news amplification, and through local news.

Line 12 Garrand Moehlenkamp – This is a creative agency with a Maine focus. This vendor assisted with concept development and content production focused on CMP’s reliability of service, customer care, sustainability, safety, and community. The resulting messaging delivered across local media channels informs all Mainers about Storm Response and Safety, Sustainability Projects in Motion, Mainer helping Mainers programs and other Community Partnerships.

Line 13 Global Strategy Group (GSG) – This vendor provided services to CMP including polling and working with focus groups. Additionally, GSG worked with CMP on messaging development and research.

Line 14 Serra Public Affair – This vendor is a strategic media and content creation agency. Serra Public Affair assisted CMP with the production of videos for digital and television campaigns.

Upon review, the total lines 11 through 14 CMP Brand costs included in FERC account 923 Outside Services would have been more appropriate to record to FERC account 930.1 General Advertising. The total $2,454,776 will be adjusted on CMP’s 2023 books, out of FERC account 923 Outside Services and booked to FERC account 930.1 General Advertising. The Company is still evaluating what, if any, impacts this may have had on the LNS revenue requirements and will supplement this response by the end of next week.

Line 15 in MPUC-CMP-1-32 Attachment 1, DG Contractor Investigation expenses is for an audit expense on CMP’s distributed generation (DG) program and a DG contractor.

Line 22 in MPUC-CMP-1-32 Attachment 1, Compliance, are compliance expenses for an internal audit and expenses for compliance programs. Compliance costs are allocated to CMP and other Operating Companies based on the Massachusetts Formula.

1. Lines 3-10 in MPUC-CMP-1-32 Attachment 1, identify various legal matters and the legal fees paid to outside Counsel to defend litigation against CMP. These costs are appropriately included in CMP’s transmission formula rate pursuant to FERC Docket No. ER20-2054 (i.e., the Settled Formula Rate). The OMPA-CMP-1-7 requests related to amounts paid to plaintiffs and their Counsel are outside the scope of this proceeding as those amounts are not recoverable through rates and not paid by ratepayers. Accordingly, CMP objects to the data request for amounts paid to plaintiffs and their Counsel.

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| Description | Status | Nature of the Service |
| CMP Legal Support ADA Suit \*\* & CMP Legal Support ADA Suit 165K \*\*  | Active | Legal action against CMP alleging violation of the Americans with Disabilities Act (ADA) |
| Deane Class Action Lawsuit 305K \*\* & Deane Litigation \*\* | Active | Class action lawsuit against CMP alleging tort damages related to CMP billing notices |
| HR CMP - Crocker v CMP \*\* | Active | Legal action against CMP alleging violation of the Maine Human Rights Act |
| Lavertu Litigation \*\* & Lavertu Litigation 60k\*\* | Closed | Personal injury claim against CMP |
| Levesque Class Action v. CMP \*\* | Closed | Class action lawsuit against CMP claiming damages related to alleged issues with CMP’s billing and metering system |

1. Line 16 in MPUC-CMP-1-32 Attachment 1, CEO CMP Reg Filings & Support-Common are intercompany expenses from Avangrid Service Company (ASC) to CMP. These costs do not relate to retail filings though the internal order was originally named with “reg filings” in the title. The line 16 costs are ASC costs allocated to CMP, about 18% of ASC costs. The balance of 82% is allocated to the other Avangrid Networks Operating Companies based on the Massachusetts Formula. The costs relate to Networks Regulatory group, Networks Business Planning group, Networks Chief Operating Officer’s group include Operational Excellence efforts to address such items as increasing field productivity.
2. Line 38 in MPUC-CMP-1-32 Attachment 1, Governing Bodies expenses are activities of the Chairman, CEO, CEO’s office, and Board of Directors, related to the management of the Avangrid companies. These costs are allocated to CMP and other Operating Companies based on the Massachusetts Formula.
3. Line 44 in MPUC-CMP-1-32 Attachment 1, IUMC Allocated Costs – CMP are intercompany expenses allocated to CMP. Costs are allocated to CMP and other Operating Companies based on the Massachusetts Formula of 18% to all Avangrid Networks operating companies, or Massachusetts Formula of 24% to all Avangrid Networks electric companies, or allocated directly to CMP. The costs relate to the areas of Telecommunications, Smart Grid Planning, Operations Technology, Energy Control Systems, and IT support of employees’ hardware and software needs. Please see OMPA-CMP-1-7 Attachment 1 for the requested cost breakdown.

**Response Prepared and Submitted By:** James Clemente