amended ---.

ATTORNEY CALLAS:

If I could speak to that, Ms. Legge, I did run into the very same issue that I think you did when you may have tried to take the piece --- the replacement page that was filed in February and insert it in place of the page --- the page of the application. It wasn't a --- it didn't match up. But I think the reason was that the replacement page was based on the Bates number filing.

I will say that having realized that a couple days ago, as I was preparing the exhibits for this hearing, I realized that all we needed to do was insert annual in place of the word replaced. I did that with the copy with the Court Reporter and the one that's on the witness stand.

CHAIR:

Thank you.

ATTORNEY LEGGE:

Thank you.

BY ATTORNEY LEGGE:

Q. Now I would like to turn to the first exhibit that I --- my colleague had passed out and the one that's marked CX 7.

CHAIR:

Excuse me for just a minute. If it's too hot back there, you all are welcome to take off your jackets. Mr. Auville, I just want to note that I have a heater on up here.

ATTORNEY LEGGE:

Thank you, Your Honor. Much appreciated.

BY ATTORNEY LEGGE:

Q. So this Cross Exhibit, the first page is attachment RV15 from your Direct Testimony. You recognize it?

A. I do.

Q. And this exhibit presents the forecasted rates of the generation project surcharge, also known as the GP surcharge, for the various customer classes of Mon Power's customers; is that right?

A. Correct.

Q. And recognizing that, you know, all customers would be impacted by the surcharge, and, you know, I don't mean to be dismissive of impacts to commercial and industrial customers, I did want to focus for now on the impact to residential customers. And so turning to page two of this Cross Exhibit, here's a table. The two --- the two columns on the left are taken directly from RV15. Does that look accurate to you?

A. It does.

Q. And so the next column over, the middle column, this is what a residential customer who uses a thousand kilowatt hours a month would pay each month for the surcharge. Does that look accurate to you? A. Yes.
Q. The math on that one's pretty easy. The next one is what each residential customer at that usage level would pay per year, with the exception of, you know, the first period is of course 16 months because the surcharge would start on September 26th. Does this look accurate to you, perhaps subject to check?
A. Is that column a 12 month column or is that a 16 month column?
Q. Well, it's a 12 month column for 2028 and beyond, but the first entry is 16 months.
A. Okay. Understood.
Q. Okay. And then the final column here is a cumulative amount that the customer --- a customer who is --- you know, a customer on September 1st, 2026 and remains so December 31st, 2031, this is how much they would have paid total in the surcharge by the end of each year. Does that look accurate to you?
A. Yes, subject to check.
Q. Okay. And the in-service dates that the Companies are planning for the generation projects or for the largest one, the gas plant, that is 12/31/2031; correct?

A. Correct.
Q. So before this plant is even in service, a residential customer would have paid $508 towards the GP surcharge in total, as forecasted by the Companies?
A. Yeah, I will qualify that. That is in the absence of any data center load that would result in a catch-up payment, per se. That would not only reduce the surcharge going forward, but would result in refunds back through that surcharge to make up for the start of the surcharge date. So this is a --- I guess how can I put this? A narrow view in terms of potentially a worst-case scenario, assuming that there are no data centers.
I would not expect this to occur in reality.
A. Well, don't worry, we'll get to the catch-up payment in a minute. But I did hear Mr. Beam yesterday saying that the application was clear that what the Companies are applying for is permission to build the generation projects and the surcharge. And this is what it looks like, as of the Companies' application for this, the forecasted surcharge; correct?
A. Based upon exactly what I said before, that this is a scenario that excludes no data centers. So that if there are data centers and we do expect them to come on at various levels, that this is not a representation of what would realistically happen, because data center load

and the allocation to that, including the catch-up payment would reduce this.
Q. But it's what would happen if no data centers came?
A. Unlikely scenario. If we're doing hypotheticals, then ---. Yeah, on a hypothetical, this is done on a hypothetical worst-case basis.
Q. And you say worst-case basis, right, that's if this is what happens if the costs that the Companies have projected stay the same. If the costs go up, the surcharge would likely go up?
A. If the costs go up, surcharge would go up. If the costs go down, the surcharge would go down.
Q. Okay. Okay. Let's get into that catch-up payment a little bit here. And I --- you know, the, the --- Mr. Callas's exhibit both cleared up some questions and inspired some new ones. So you might have to bear with me a little bit. So I was reviewing your Rebuttal Testimony at page Bates 140. I think it would be helpful to turn there now and we can also have Mr. Callas's exhibit handy.
So the paragraph starting line one, this is a paragraph discussing this new catch-up payment idea. That's correct?
A. Was there a question?
Q. This --- this paragraph discusses the catch-up