Sheet 1

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY GAS SYSTEM ENHANCEMENT ADJUSTMENT FACTOR FOR THE GAS SYSTEM ENHANCEMENT PROGRAM SCHEDULE GSEAF

1.0 <u>PURPOSE AND APPLICABILITY</u>

1.1 **Purpose**

The purpose of the Gas System Enhancement Program ("GSEP") tariff is to establish a procedure that implements the provisions of G.L. c. 164, § 145, allowing Fitchburg Gas and Electric Light Company (the "Company"), subject to the jurisdiction of the Department of Public Utilities (the "Department"), to obtain recovery of eligible costs associated with the replacement or improvement of existing natural gas distribution infrastructure to improve public safety or infrastructure reliability. In accordance with G.L. c. 164, § 145(b), all costs associated with the GSEP are incurred to address aging or leaking natural gas infrastructure within the Commonwealth in the interest of public safety and reducing lost and unaccounted for natural gas through a reduction in natural gas system leaks.

1.2 Applicability

The GSEAF and the GSERAF, as defined herein, shall be applied to all firm sales and firm transportation throughput of the Company as determined in accordance with the provisions of Section 3.0 of this clause. The GSEAF and GSERAF shall be determined annually by the Company, as defined below, subject to the Department's review and approval. For billing purposes, the GSEAF and GSERAF shall be included in the Local Distribution Clause ("LDAC").

1.3 Effective Date

In accordance with G.L. c. 164, §§ 145 (a), (d), (e), the annual GSEAF associated with each GSEP Investment Year beginning on and after January 1, 2015, shall be effective on May 1 of the respective GSEP Investment Year, based on the GSEP Revenue Requirement calculated in the annual GSEP Plan filed with the Department on or before October 31 in the year prior to the GSEP Investment Year. The annual GSERAF shall be effective on the November 1 following each GSEP Investment Year.

2.0 **DEFINITIONS**

- (1) <u>Accumulated Deferred Income Taxes</u> are the net reduction in Federal income and State franchise taxes associated with the use of accelerated depreciation allowed for income tax purposes.
- (2) <u>Accumulated Reserve for Depreciation</u> is the cumulative net credit balance arising from the provision for Depreciation Expense.

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- (3) <u>Depreciation Expense</u> is the return of the Company's investment in Rate Base at established depreciation rates as approved by the Department in the Company's most recent general distribution rate proceeding.
- (4) Eligible GSEP Investment is the cost of Eligible Infrastructure Replacement Projects planned for the current GSEP Investment Year, plus the cumulative actual and planned cost of Eligible Infrastructure Replacement Projects completed through the end of the year prior to the current GSEP Investment Year, as summarized in the annual GSEP Plan. Costs included in the GSEP Revenue Requirement associated with Eligible GSEP Investment are depreciation expense, property taxes, and the return on investment utilizing the after-tax rate of return approved by the Department in the Company's most recent general distribution rate proceeding, adjusted to a pre-tax basis by using the current federal and state income tax rates applicable to the GSEP Investment Year. Project costs shall be Eligible GSEP Investment in the year completed and placed into service. Eligible GSEP Investment includes costs recorded in the following MDPU/FERC plant accounts:

Mains – Transmission
Mains – Distribution
Services – Distribution
Meters – Distribution
Meter Installations – Distribution
House Regulators – Distribution

The costs booked to the above accounts shall be determined in accordance with the Company's application of the Uniform System of Accounts for Gas Companies, 222 C.M.R. § 50.00, Gas Plant Accounts, in use during the test year of its previous base rate case filed pursuant to G.L. c. 164, § 94.

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- (5) Eligible GSEP Savings are the cumulative reduction in operating and maintenance leak repair expense achieved with the replacement of leak-prone main. Eligible GSEP Savings shall be equal to the most recent three-year average of leak repair cost per mile for non-cathodically protected steel mains, cast iron mains, wrought iron mains, and pre-1985 Aldyl-A polyethylene mains, updated annually in the GSEP Plan filed on October 31 of each year for the subsequent construction year. The costs associated with leak repair expense shall be determined in accordance with the Uniform System of Accounts for Gas Companies, 220 C.M.R. § 50.00, Operations and Maintenance Expense Accounts, in use during the test year of its previous base rate case filed pursuant to G.L. c. 164, § 94.
- (6) Existing Infrastructure is mains, services, meter sets, and other ancillary facilities composed of non-cathodically protected steel, cast iron, wrought iron, and pre-1985 Aldyl-A polyethylene. [G.L. c. 164, § 145(c)]
- Eligible Infrastructure Replacement Project is a project to replace or (7)improve the Company's Existing Infrastructure that: (i.) is made on or after January 1, 2015; (ii) is designed to improve public safety or infrastructure reliability; (iii) does not increase the Company's revenue by connecting an improvement for a principal purpose of serving new customers; (iv) reduces, or has the potential to reduce, lost and unaccounted for natural gas through a reduction in natural gas system leaks; (v) is not included in the Company's current rate base as determined in the gas company's most recent rate proceeding; (vi) may include use of advanced leak repair technology approved by the Department to repair an existing leak-prone gas pipe to extend the useful life of such gas pipe by no less than 10 years; and (vii) may include replacing gas infrastructure with utility-scale non-emitting renewable thermal energy infrastructure . [G.L. c. 164, § 145(a); St. 2016, c. 188 § 13; St. 2022, c. 179, § 58]

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- (8) <u>Gross Plant Investments</u> are the capitalized costs of GSEP plant investments including costs of removal recorded on the Company's books for Eligible Infrastructure Replacement Projects. Gross Plant Investment for a GSEP Investment Year shall be the cumulative actual and planned cost of Eligible Infrastructure Replacement Projects completed through the end of the year prior to the current GSEP Investment Year and the planned capitalized investment for the current GSEP Investment Year associated with the GSEP Plan filed with the Department on October 31 of the year prior to the GSEP Investment Year. Actual capitalized cost of GSEP Investments shall include allowance for funds used during construction ("AFUDC") and applicable overhead and burden costs subject to the test provided in Section 5.0.
- (9) <u>GSEAF</u> is the Gas System Enhancement Adjustment Factor that recovers the aggregate GSEP Revenue Requirement approved by the Department for actual and planned Eligible GSEP Investment made beginning January 1, 2015, and in annual periods January 1 through December 31 of each GSEP Investment Year, with the annual recovery period beginning May 1 of each GSEP Investment Year for the cumulative spending on planned or completed projects anticipated to be placed in service through the end of the GSEP Investment Year.
- (10) <u>GSERAF</u> is the Gas System Enhancement Reconciliation Adjustment Factor that recovers the GSEP Reconciliation Adjustment. The GSERAF shall be effective November 1 following each GSEP Investment Year and shall be submitted to the Department 90 days before the effective date of November 1.
- (11) <u>GSEP Investment Year</u> is the annual period beginning on January 1 and ending on December 31, during which the Company anticipates placing GSEP Eligible Infrastructure Replacement Projects in service.
- (12) <u>GSEP Offsets</u> represent the reduced operating and maintenance expense associated with the elimination of natural gas leaks through Eligible Infrastructure Replacement Projects. GSEP Offsets are determined by multiplying Eligible GSEP Savings by the total miles of noncathodically protected steel mains, cast iron mains, wrought iron mains, and pre-1985 Aldyl-A polyethylene mains, and Incidental Infrastructure, replaced or abandoned by the Company in the period January 1 through December 31 of the respective GSEP Investment Year. For the purposes of calculating the GSEP Offsets, the Company shall identify, by material

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type, all miles of mains replaced or abandoned in connection with GSEP projects.

- (13) <u>GSEP Plan</u> is the Company's plan to replace or improve existing distribution infrastructure in accordance with G.L. c. 164, § 145, as filed with the Department on October 31 of each year, including information pertaining to eligible infrastructure replacement undertaken to eliminate natural gas system leaks in the subsequent construction year and over a future timeline allowing for the removal of all leak-prone infrastructure on an accelerated basis. [G.L. c. 164, § 145 (a), (c) and (d)]
- (14) <u>GSEP Reconciliation Adjustment</u> is the difference between the GSEP Revenue Requirement on cumulative Eligible GSEP Investment for a GSEP Investment Year and the billed revenue from the GSEAF associated with the same GSEP Investment Year. The GSEP Revenue Requirement, for this purpose, shall reflect actual cumulative Eligible GSEP Investment. The GSEP Reconciliation Adjustment shall include interest on any balance, accrued at the prime rate as reported by the *Wall Street Journal*. The GSEP Reconciliation Adjustment shall be recovered through the GSERAF.
- (15) <u>GSEP Revenue Requirement</u> is the accumulated revenue requirements through December 31 of each GSEP Investment Year based on the Eligible GSEP Investment to be completed during the GSEP Investment Year and inclusive of the actual and planned Eligible GSEP Investment incurred through the end of the year prior to the current GSEP Investment Year. The revenue requirement for each GSEP Investment Year will be calculated on a monthly basis, and shall represent the sum of the revenue requirement for each of the twelve months of the respective year. The annual revenue requirement on Eligible GSEP Investment for subsequent years will also be calculated on a monthly basis.
- (16) <u>Incidental Infrastructure</u> is any connected facilities such as services, meters, or regulators or pre-existing pipe segments, including but not limited to, plastic and cathodically protected steel pipe segments, that must be installed, replaced or retired to enable the replacement project to become operational and/or manage the costs of the replacement project, and where such segments are not more than 50 percent of the total replacement project footage.

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- (17) <u>Non-Emitting Renewable Thermal Infrastructure Project</u> is a utility-scale project that replaces natural gas distribution infrastructure with distribution infrastructure that supplies heating, or heating and cooling, from fuel sources whose combustion does not emit greenhouse gases, as defined by section 1 of chapter 21N of the Massachusetts General Laws; provided, however, that a "non-emitting renewable thermal infrastructure project" may include, but shall not be limited to, a networked geothermal system.
- (18) <u>Property Tax Rate</u> is the Company's composite property tax rate determined in the Company's most recent general distribution rate proceeding, calculated as the ratio of total annual property taxes paid to total taxable net plant in service.
- (19) <u>Rate Base</u> is the investment value upon which the Company is permitted to earn its authorized rate of return.
- (20) <u>Rate Base Allocators</u> are the allocation factors for each GSEP Rate Class Sector that are applied to the GSEP Revenue Requirements that the Company is allowed to recover through the GSEAF to determine the GSEAF rate for each Rate Class Sector. The following are the Rate Base Allocators as approved by the Department in the Company's most recent general distribution rate proceeding:

Rate Class Sector	Rate Base Allocators
Residential	62.33%
Small General Service	11.48%
Medium General Service	13.82%
Large General Service	12.37%

3.0 <u>RATE FORMULAS</u>

3.1 Gas System Enhancement Adjustment Factor ("GSEAF") Formula:

 $CAP = 3.0\% * TOT_REV$

And:

$$GSEP_REC_{c} = \left[\sum_{m=12}^{m=1} ((RB \times PTRR) + DEPR)\right] + PTMS - OFF$$

And:

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 $RB = ((GP_{pm} - ARD_{pm} - ADIT_{pm}) + (GP_{cm} - ARD_{cm} - ADIT_{cm})) \div 2$

If

 $CAP < GSEP_REC_c - GSEAF_REC_p$

Then

 $GSEAF_{s} = (GSEP_REC_{c} - ((GSEP_REC_{c} - GSEAF_REC_{p}) - CAP)) \times RBA_{s}$ A: TPvols

Else

$GSEAF_s =$	$(\underline{GSEP REC_c + DEF REC}) \times RBA_s$
	A: TPvols

<u>and</u>

 $DEF_REC = Lesser of (DEF_r or (CAP - (GSEP_REC_c - GSEAF_REC_p)))$

Where:

S	Designates a separate factor for each Rate Class Sector.
GSEAF _s	The Gas System Enhancement Adjustment Factor, by Rate Class Sector, as defined in Section 2.0 (20).
GSEP_REC	The GSEP Recovery, consisting of GSEP Revenue Requirement associated with the cumulative Eligible GSEP Investments for the respective GSEP Investment Year. Cumulative Eligible GSEP Investments will consist of actual and planned investment from January 1, 2015 through the end of the respective GSEP Investment Year.
GSEAF_REC _p	The annual recovery amount reflected in the GSEAF for the applicable prior GSEP Investment Year. The current year GSEP_REC is compared against the GSEAF_REC _p to quantify the change in the recovery that is to be compared to the CAP.
RBAs	Rate Base Allocator for each Rate Class Sector, as specified in Section 2.0 (20).

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- A:TPvols Forecasted Annual Throughput Volumes for each Rate Class Sector, inclusive of all firm sales and firm transportation throughput.
 RB The Rate Base associated with the cumulative Eligible GSEP Investments. For purposes of establishing a GSEAF rate and the GSEP Reconciliation Adjustment, the rate base will be calculated using projected (GSEAF) and actual (GSERAF) monthly balances for GP, ARD and ADIT.
 PTRR The pre-tax rate of return shall be the after-tax weighted average cost of capital established by the Department in the
- average cost of capital established by the Department in the Company's most recent general rate proceeding, adjusted to a pre-tax basis by using currently effective federal and state income tax rates applicable to the period of the Eligible GSEP Investment.
- DEPR The annual depreciation expense associated with the cumulative monthly Eligible GSEP Investments. For purposes of determining the GSEAF and the GSEP Reconciliation Adjustment, depreciation expense is equal to the sum of the depreciation expense calculated on a monthly basis based on the monthly plant balances utilized in determining rate base.
- PTMS The property taxes calculated based on the cumulative net GSEP plant investment at the end of the GSEP Investment Year multiplied by the Property Tax Rate established by the Department in the Company's most recent general distribution rate proceeding. Property taxes will be included in the GSEP Revenue Requirement beginning in the year following the GSEP Investment Year at 50% of the annual property tax amount for the first year. In subsequent years, the GSEP Revenue Requirement will reflect a full year of property taxes.

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OFF	The total GSEP Offset associated with reduced leak repair operating and maintenance costs. The GSEP Offset for the first GSEP Investment Year will be 50% of the annual GSEP Offset calculated. In subsequent years, the GSEP Offset will reflect a full year of the calculated GSEP Offset. For purposes of determining the GSEP Reconciliation Adjustment for the first year of each GSEP Investment Year, the annual GSEP Offset will be allocated to months based on the monthly miles of main replaced.
GP	The cumulative GSEP Gross Plant Investments including cost of removal.
ARD	The Accumulated Reserve for Depreciation associated with the cumulative Eligible GSEP Investments.
ADIT	The Accumulated Deferred Income Taxes associated with the cumulative Eligible GSEP Investments.
DEF	Cumulative actual Reconciliation Adjustment amounts for the prior GSEP Investment Years which have not been reflected in rates due to being in excess of the CAP and are deferred for recovery in a subsequent GSEAF.
DEF_REC	Amount of DEF that is allowed for recovery in the GSEAF.
CAP	The maximum change in the revenue requirement to be billed in any given year through the Company's GSEAF.
TOT_REV	The total annual delivery revenue from sales and transportation customers during the calendar year prior to the year in which the GSEP investment plan is filed plus imputed gas revenues for sales and transportation customers, calculated as the product of (1) the historical average cost of gas per therm from the period starting in 2013 and ending with the most recent year that actual data is available at the time of the October plan filing and (2) the average of weather normalized sales from sales and transportation throughput over the same period.
С	The current year.

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- Р The prior year.
- Cm The current month.
- The prior month. Pm
- М Month
- R Subsequent GSERAF Filing.

3.2 Gas System Enhancement Reconciliation Adjustment Factor ("GSERAF") Formula:

If $(RA - DEF REC - GSERAF REV_{May-Oct}) < 0$

Then

(RA-DEF REC-GSERAF REV_{May-Oct}) x RBAs GSERAF_s= A: TPvols

Else

If
$$CAP < GSEP REC_c - GSEAF REC_p + DEF REC$$

Then

GSERAF = 0

Else

RA REC = Lesser of ($(RA - DEF REC_f - GSERAF REV_{May-Oct})$ or ($CAP - (GSEP REC_c - GSERAF REV_{May-Oct})$) GSEAF $REC_p + DEF REC_f$))

And

GSERAF_s= RA REC x RBAs A: TPvols

And

 $DEF = RA - RA REC - DEF REC_f - GSERAF REV_{May-Oct}$

Issued by:	Daniel Hurstak	Filed: July 15, 2024
	Vice President and Treasurer	Effective: July 1, 2024

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Where:

GSERAFs	The Gas System Enhancement Reconciliation Adjustment Factor, by Rate Class Sector, as defined in Section 2.0 (20).
S	Designates a separate factor for each Rate Class Sector.
RA	GSEP Reconciliation Adjustment – Account 173.35.00, inclusive of the associated interest, as outlined in Section 6.0, for the GSEP Investment Years as of May 1 of each year.
RA_REC	GSEP Reconciliation Adjustment that is allowed to be recovered in the GSERAF.
RBAs	Rate Base Allocator for each Rate Class Sector, as specified in Section 2.0 (20).
A:TPvols	Forecasted Annual Throughput Volumes for each Rate Class Sector, inclusive of all firm sales and firm transportation throughput.

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САР	The maximum change in the revenue requirement to be billed in any given year through the Company's GSEAF.
GSEP_REC	The GSEP Recovery, consisting of GSEP Revenue Requirement associated with the cumulative Eligible GSEP Investments for the respective GSEP Investment Year. Cumulative Eligible GSEP Investments will consist of actual and planned investment from January 1, 2015 through the end of the respective GSEP Investment Year.
GSEAF_REC	The annual recovery amount reflected in the GSEAF for the applicable prior GSEP Investment Year. The current year GSEP_REC is compared against the GSEAF_REC _p to quantify the change in the recovery that is to be compared to the CAP.
c	The current year.
р	The prior year.
F	Subsequent GSEAF filing.
GSERAF_REV May-Oct	GSERAF revenue estimated for the period May through October of the current year.
DEF_REC	Amount of DEF that is allowed for recovery in the GSEAF.
DEF	Cumulative actual Reconciliation Adjustment amounts for the prior GSEP Investment Years which have not been reflected in rates due to being in excess of the CAP and are deferred for recovery in a subsequent GSEAF.

3.3 Application of GSEAF to Customer Bills

The GSEAF (\$ per therm) and GSERAF (\$ per therm) shall be calculated to the nearest one one-hundreth (\$0.0001) of a cent per therm and will be applied to the monthly firm sales and firm transportation throughput.

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4.0 LIMITATIONS ON ANNUAL GSEAF and GSERAF CHARGES

- 4.1 Unless modified by the Department, annual changes in the GSEP recovery that may be billed in any year shall be limited by a cap ("GSEP Cap"), which is an amount equal to 3.0 percent of the Company's most recent calendar year total firm delivery revenues at the time of the October plan filing, plus imputed gas revenues for sales and transportation customers, calculated as the product of (1) the historical average cost of gas per therm from the period starting in 2013 and ending with the most recent year that actual data is available at the time of the October plan filing and (2) the average of weather normalized sales from sales and transportation throughput over the same period. [G.L. c. 164, § 145 (f)]. In addition, in the instance where the GSERAF is a surcharge to customers, the recovery of the annual GSERAF that may be billed in any year beginning in November 1 will be limited by the difference between the GSEP Cap and the annual change in the GSEP recovery.
- 4.2 In accordance with G.L. c. 164, § 145 (f), the Department may increase the GSEP Cap to a percentage of total firm revenues, including gas revenues attributable to sales customers and including imputed cost of gas revenues for the Company's transportation customers.
- 4.3 Application of the GSEP Cap shall not affect the calculation of GSEP recovery, including GSEP Revenue Requirement, in subsequent periods. However, any GSEP recovery approved by the Department in excess of the GSEP Cap may be deferred for recovery in the following year.

5.0 OVERHEAD AND BURDEN ADJUSTMENTS

5.1 For purposes of GSEP calculations, the actual overheads and burdens shall be reduced to the extent that actual O&M overheads and burdens in a given year are less than the amount included in base rates as determined in the most recently approved base rate case proceeding. Such reduction shall be the difference between actual O&M overheads and burdens and the amount included in base rates. In addition, the percentage of capitalized overheads and burdens assigned to GSEP projects shall be set equal to the ratio of GSEP to non-GSEP direct costs in any given year.

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6.0 <u>RECONCILIATION AJDUSTMENTS</u>

- 6.1 Account 173.35.00 shall contain the accumulated difference between revenues billed through the GSEAF for a GSEP Recovery associated with a respective GSEP Investment Year, as calculated by multiplying the GSEAFs times the respective Rate Class Sector monthly firm sales and transportation throughput, plus the revenues billed through the GSERAF as calculated by multiplying the GSERAFs times the respective Rate Class Sector monthly firm sales and transportation throughput , unless otherwise identified in the Company's billing records, and the revenue requirement associated with the actual Eligible GSEP allowed, plus carrying charges calculated on the average monthly balance using the consensus prime rate as reported by the *Wall Street Journal* and then added to the end-of-month balance. Any deferral of GSEP Recovery as a result of the limitation of the amount allowed to be billed in any one year in accordance with the GSEP Cap shall be reflected in the GSEP Reconciliation Adjustment Account with the monthly calculation of carrying charges as set out herein.
- 6.2 The GSEP Revenue Requirement will initially be based on planned spending for Eligible Infrastructure Replacement Projects for the GSEP Investment Year, plus cumulative actual and planned investment in eligible in-service plant through the end of the prior GSEP Investment Year. Pursuant to Section 7.3 below, upon Department approval of actual Eligible GSEP Investment, the Company shall adjust the GSEP Revenue Requirement of the applicable GSEP Investment Year.
- 6.3 The GSEP Reconciliation Adjustment as of the implementation date of base rates established in a Company's next general rate proceeding, including any aspect of the GSEP Reconciliation Adjustment pertaining to the cumulative deferral of revenue requirement recovery due to application of the GSEP Cap in prior year(s), shall be included in developing the GSEAF established as of the effective date of the new base rates. Upon the effective date of new base rates, the GSEAF then in effect shall be adjusted to reflect the removal of cumulative GSEP Investment through the end of the test year of such general rate proceeding. The reduction to the GSEP recovery shall be concurrent with the implementation of the new base distribution rates. Subsequent October 31 filings of GSEP Plans shall exclude cumulative GSEP Investment included in rate base through the end of the test year of such general rate proceeding. The recovery of GSEP Investment not included in a general rate proceeding shall continue through the GSEP until the GSEP Investment is included in rate base as part of a subsequent general rate proceeding. The filing of a general rate proceeding shall not result in a Company not recovering eligible GSEP costs incurred prior to the date new base rates go into effect.

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7.0 INFORMATION TO BE FILED WITH THE DEPARTMENT

7.1 Information For Subsequent Construction Year

Any GSEP Plan submitted to the Department on October 31 of each year in relation to Eligible GSEP Investment in the subsequent construction year shall include, but not be limited to:

- (a) A plan for the completion of eligible infrastructure replacement projects relating to mains, services, meter sets and other ancillary facilities composed of non-cathodically protected steel, cast iron, wrought iron, and pre-1985 Aldyl-A polyethylene, prioritized to implement the federal gas distribution pipeline integrity management plan annually submitted to the Department and consistent with subpart P of 49 C.F.R. part 192;
- (b) An anticipated timeline for the completion of each project;
- (c) The estimated cost of each project;
- (d) Rate change requests;
- (e) A description of customer costs and benefits under the plan; and
- (f) Any other information the Department considers necessary to evaluate the plan.

7.2 Information on Timeline for Removal of Leak-Prone Infrastructure

A GSEP Plan submitted on or before October 31 of any year shall include a timeline for removal of all leak-prone infrastructure on an accelerated basis specifying an annual replacement pace and program end date with a target end date of either: (a) not more than 20 years, or (b) a reasonable target end date considering the allowable recovery cap established pursuant to G.L. c. 164, § 145(f). [G.L. c. 164, § 145(c)]

After the filing of the initial GSEP Plan on October 31, 2014, at five-year intervals, the Company shall provide the Department with a summary of its replacement progress to date, a summary of work to be completed during the next five years and any similar information the Department may require. [G.L. c. 164, § 145(c)]

7.3 Information to be filed with the Department for GSEP Reconciliation

On or before May 1 of each year subsequent to a GSEP Investment Year, the Company shall file with the Department certain information to support its GSEP Reconciliation ("GREC"). The Company shall file final project documentation for projects completed in the prior year to demonstrate: (a) substantial compliance with the GSEP Plan in effect for the respective GSEP Investment Year; (b) that replacement or retirement of Incidental

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Infrastructure constituting 25 percent to 50 percent, inclusive, of a project's total footage was either operationally necessary or cost effective; and (c) that project costs were reasonably and prudently incurred. The Company shall also file the revenue requirement based on the actual costs submitted in this filing, which shall form the basis of the GSERAF to become effective on November 1.