

Requests for Kamran Hassan:

Q.DPS.GMP.3-10: In reference to Mr. Hassan's Rebuttal Testimony, please confirm:

a. that Osmose is using a 3/4 strength factor for decay for all poles designed to withstand extreme wind and ice; and

b. whether or not the NESC requires an extreme wind and ice design.

A.DPS.GMP.3-10:

a. Osmose's initial description of its pole inspection methodology, on which Mr. Hassan's testimony was based, indicated the strength factor for flagging poles for replacement or rehabilitation was different for 250B vs. 250C and 250D poles, but in evaluating this discovery question further we have determined that Osmose is currently applying the 2/3 strength factor as the replacement or rehabilitation flag for all poles. Based on pole height, very few poles in the GMP system would be required to meet the 3/4 standard.

We have confirmed Osmose will use the 3/4 strength factor for flagging poles subject to Rule 250C or 250D going forward. The subset of poles meeting the 250C and 250D design standards will be identified in information provided to Osmose to facilitate their review. This will allow flagging for replacement or rehabilitation based on design parameters for the poles in these specific categories and could be implemented in a manner consistent with Mr. Ivey's underlying recommendation.

b. **Objection 5.** This request is vague and ambiguous. Mr. Hassan's testimony does not describe the application of wind and ice design to any specific poles or lines, and it is unclear what circumstances this request is referring to. Without waiving or otherwise limiting the objection, GMP responds as follows. Rules 250C and 250D generally apply only to structures or its supported facilities that exceed 60 ft (18 m) above ground or water level. As noted in Mr. Hassan's testimony and above, the vast majority of distribution poles fall under Rule 250B and are designed as such.

Person/s Responsible for Response: Kamran Hassan
Title of Person/s: Director of Substation Operations
Date: June 10, 2026