INTERROGATORIES AND REQUESTS TO PRODUCE

Subject to the General Objections stated above, GMP responds as follows:

Q.DPS.GMP.2-1: In reference to A.DPS.GMP.1-1, GMP describes benefits associated with the four-year MYRP, but, in response to the question, did not identify any risks to either GMP or ratepayers of a longer-term plan, as requested by the question. Please identify any risks to either GMP or ratepayers of a longer-term MYRP.

Objection 5. The original question, DPS.GMP.1-1, incorrectly characterized the term of the existing plan when requesting a comparison of the Proposed Plan to the Current Plan. The Current Plan is a four-year plan, as is the Proposed Plan; GMP is not proposing a "longer-term" plan. The comparison therefore is vague and ambiguous in that it does not define the relative "longer-term" assumed in the request. Without waiving or otherwise limiting the objection, GMP responds as follows:

A.DPS.GMP.2-1:

With respect to a comparison between the Current Plan and the Proposed Plan, see response to DPS.GMP.1-1. As a general matter, the longer a plan runs, the greater the potential that fixed components of the plan may diverge from actual forecasts or anticipated needs at the beginning of the plan period, which presents risks for both GMP and customers. Both the Current Plan and the Proposed Plan contain elements to address this type of risk including annual reforecasting of certain costs, such as power supply costs, and adjustors during the plan period to address costs that are uncertain or highly variable, including storm and power supply costs, as well as noted categories of O&M costs that are updated annually by formula or third party forecasts. The Proposed Plan also includes mechanisms to share risk in the event there are significant divergences from forecasts, including the ESAM, which has an asymmetrical deadband and sharing portion favoring customers. The plan also includes limited exceptions for certain defined capital expenditures that may change over the course of the Proposed Plan period, but in response to prior Department comments, GMP has limited these to specific defined programs (such as customer driven storage programs), or specific projects that may occur during the term of the Plan (potential Searsburg repowering and potential Deerfield Wind purchase). In the event circumstances change substantially, both the Current Plan and the Proposed Plan allow modification or termination with Commission approval.

Person/s Responsible for Response: Mike Burke
Title of Person/s: VP, Operations
Date: December 19, 2025

INTERROGATORIES AND REQUESTS TO PRODUCE

Subject to the General Objections stated above, GMP responds as follows:

Q.DPS.GMP.1-54: Please provide the total amount spent each year for vegetation management and hardening (separately) since 2000 by GMP operating district.

Objections 1, 2, 8. The question is unduly burdensome and not proportional to the needs of the case and would call for extensive document review or additional analysis. The request is also vague because the term "hardening" is not defined. Without otherwise waiving or limiting the objection, GMP responds as follows:

A.DPS.GMP.1-54:

Please See Attachment DPS.GMP.1-54 for budgeted and actual right of way vegetation management costs from 2014 to 2025, and Supplemental Attachment DPS.GMP.1-54a for actual right of way vegetation management spending from 2012 and 2013. Please note the data provided for 2012 and 2013 includes total combined vegetation management spending for GMP and CVPS, based on data previously provided from CVPS's legacy accounting software for those years.

Person/s Responsible for Response: Josh Castonguay
Title of Person/s: VP, Chief Innovation Officer, Generation & Power Supply
Date: January 2, 2026