

LOUISIANA PUBLIC SERVICE COMMISSION

ORDER NUMBER R-37773

LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE.

Docket No. R-37773, In re: Vegetation Management Pilot Program

(Decided at the March 18, 2026 Business and Executive Session.)

I. Background

Pursuant to the directive at the October 23, 2025 Business and Executive Session (“B&E”), the Louisiana Public Service Commission (“LPSC” or “Commission”) directed Staff to:

“... to open a rulemaking docket to create a vegetation management pilot program for jurisdictional electric utilities, with a focus on the distribution system. This pilot shall be voluntary and for a period of 18 months, with a review thereafter on whether the pilot was successful and should continue. I leave the specific requirements up to Staff, but ask that Staff incorporate set requirements for the spending level, type of vegetation management allowed, and customer protections so that the utility does not have a blank check for spending. This is a short-term, voluntary pilot, so we should keep it simple and ensure minimum impact on customer bills. I further direct Staff to use best efforts to have the pilot in place in early 2026 so that we can see the benefits of enhanced vegetation management before the start of the peak of the 2026 Hurricane Season.”

Notice of this Rulemaking (“Notice”) was published in the Commission’s Official Bulletin dated November 7, 2025 with Entergy Louisiana, LLC (“ELL”), 1803 Electric Cooperative, Inc. (“1803”), Association of Louisiana Electric Cooperatives, Inc. (“ALEC”), Cleco Power LLC (“Cleco Power”), the Louisiana Energy Users Group (“LEUG”), and the Alliance for Affordable Energy (“AAE”) timely intervening. Southwestern Electric Power Company (SWEPCO”) filed a Motion to Intervene Out-of-Time, which was subsequently granted (hereinafter collectively “Intervenors”).

The *Notice* provided an outline of the proposed pilot program (“pilot”) and sought comments from stakeholders regarding the length of the pilot, each electric utility’s distribution allocation amongst its customer classes, and how the true-up/prudence reviews should be conducted for this pilot program. Staff sought comments on these three topics because when preparing the outline of the proposed pilot, it became clear that those three topics needed to be determined in order to establish a clear pilot with defined parameters and to ensure the Commission’s directive of the pilot being short-term with maximum benefits and minimal customer impact. Comments and additional information were received from ALEC, Cleco Power,

ELL, and SWEPCO. The comments generally supported the concept of the pilot program, but had varying opinions on Staff's topics.

Additionally, Staff issued a *Request for Information* to all electric utilities on January 13, 2026 requesting each utility's annual vegetation management spending over the past three years. Responses were received from 1803, Jefferson Davis Electric Cooperative, Dixie Electric Membership Corporation, Washington-St. Tammany, Claiborne Electric Cooperative, Inc., Panola-Harrison Electric Cooperative, Inc., Beauregard Electric Cooperative, Inc., Cleco Power, SWEPCO, South Louisiana Electric Cooperative Association, and ELL. The spending varied from utility to utility and from year to year; however, the majority of each utility's spending remained fairly consistent.

On January 29, 2026, Staff issued the *Report and Recommendation and Notice of Proposed Final Rule* seeking comments on specific topics and redline revisions of the proposed rules from all intervenors by February 9, 2026 in anticipation of the final rule being considered by the Commission at the February 25, 2026 Business and Executive Session. Comments and redline revisions were received from Cleco Power, ELL, and SWEPCO, which Staff was generally amendable with, and reflected those changes in the Final Rule filed into the record on February 13, 2026. *Staff's Report and Recommendation on Final Rule* was initially considered at the February 25, 2026 B&E, but was deferred to the March 18, 2026 B&E where the matter was taken up by the Commission.

II. Intervenor Comments

All utilities stated the importance of a longer duration for the proposed pilot in order to ensure its effectiveness, stating that while vegetation management occurs annually, the benefits/results sometimes are not immediate. Comments regarding the true-up and prudence assessments varied – with the IOUs proposing to include the true-up and prudence assessments within Staff's annual review of the respective utility's Formula Rate Plan ("FRP"), or equivalent, evaluation report. ALEC, however, recognized that some utilities have tight FRP review cycles, which could put more pressure on Staff to complete the prudence reviews, or potentially delay the overall review of a Utility's annual review. As such, ALEC indicated that while prudence reviews under this proposed pilot could be included within annual reviews or handled separately, ALEC's opinion was that a separate proceeding may provide the most efficient review path. ELL provided additional considerations and concerns to ensure the pilot accomplished the goals set out in the

Commission directive – enhancing vegetation management while remaining simple to administer and providing minimal customer impact. The additional topics raised by ELL revolved around rate mechanics and flexible spending levels.

On February 9, 2026, proposed redlines were received from Cleco Power, ELL, and SWEPCO. SWEPCO had minimal changes – mostly grammatical – while Cleco Power and ELL provided revisions with the intention of clarifying certain components of the rules. All three IOUs proposed revisions to provide clarification to the definition of Customer Bills in order to determine the 1% cap, including the definition for residential bill and the average customer bill. ELL also proposed a new definition for Standard Spending given its use throughout the pilot as well as to assist in addressing Staff’s prohibition on non-standard vegetation management costs. On the cost recovery mechanism, Cleco Power also provided clarifying revisions that the pilot would allow recovery via a utility’s current recovery mechanism in lieu of establishing a new mechanism.

III. Staff’s Final Rule

The Commission’s directive to open this rulemaking recognized the importance of vegetation management, especially for our electric distribution systems, as vegetation-related outages are a major contributor to customer interruptions and such disruptions can occur during various types of weather-related events in Louisiana, not just during hurricanes. The Commission’s directive sought to establish a pilot program whereby electric utilities had a pathway to enhance its vegetation management over a specific timeframe in order to allow the Commission to determine whether such enhanced spending on vegetation management is in the public interest as electric utilities have stated throughout the years. While the Commission supports a pathway for enhanced spending, the Commission’s directive also sought customer protections to ensure that the electric utilities do not have a “blank check” when it comes to additional vegetation management spending.

Staff issued the *Report and Recommendation on Proposed Final Rule* on January 29, 2026, and the *Final Rule* on February 13, 2026 proposing to establish a vegetation management pilot program for up to a two-year and nine-month timeframe with the anticipation of a utility’s pilot beginning April 1, 2026. Should a utility’s pilot begin after April 1, 2026, the length of that utility’s pilot would decrease by each month of delay initiating the pilot. The proposed pilot also limited costs incurred to distribution-level vegetation management as that is the focus of the pilot. Given this limitation, Staff also recommended that each utility’s distribution cost allocation remain the

same for the pilot as it is for other distribution expenses. Continuing with the cost components of the pilot, Staff also proposed that a utility's costs incurred under the pilot could not exceed the respective utility's 2025 vegetation management expenses with a 1% cost cap as the ceiling of additional allowed vegetation management. The 1% cap was based on each utility's average residential customer's bill for the 2025 calendar year and encompassed the entirety of charges to a customer, not just base rate charges. For the pilot's first year, since it will be a partial year, Staff recommended a twelve-month allocation of each utility's 2025 budget to the remainder of 2026. In other words, if a utility implemented the pilot on April 1, 2026, the utility will be allowed to spend up to nine-twelfths of its 2025 in 2026.¹

To ensure the electric utilities utilize the pilot as intended and do not spend more than is allowed, Staff proposed both an annual true-up and a prudence review. Staff recommended that the annual true-up occur during Staff's review of a utility's FRP annual review, but that each utility's prudence review will occur at the end of the pilot, or no later than December 31, 2028. The proposed rules also contemplated that if Staff found any errors, or excessive spending by a utility, Staff had the right to seek discovery from the utility. Further, should the error, or excessive spending, be confirmed, the utility will be required to make a refund to customers.

In drafting the proposed final rules, Staff found it necessary to include additional clarification on the applicability and participation of this pilot. Staff's proposed pilot included a prohibition to exclude any interim, or special, vegetation management spend from a utility's 2025 spending budget. Staff also inserted reservation language for the Commission to determine the 2025 standard spending of a utility if the value does not correlate to the utility's historical spending on vegetation management. Staff recognized the increase in spending for SWECPO in 2025, and ELL raised the potential of increased vegetation management costs associated with storm restoration. Staff is mindful that there may be other utilities whose spending does not match its historical spending and the Commission may want to alter its 2025 standard spending. Staff inserted reservation language in the definition of Standard Spending, as well as in Section 601-Review of Notice and Rider. Staff also clarified that only electric utilities with vegetation management costs at the distribution-level may participate in the pilot.

¹ Should the pilot begin on another date, the same allocation will apply based on the month the pilot begins. For example, if the pilot begins on May, 1, 2026, utilities will be allowed to spend up to eighth-twelfths of 2025's budget in 2026.

The final rule and pilot reflect not only the Commission’s directive, but also the comments, redline revisions, and information provided by the intervenors in this Docket. Generally, Staff was amenable to the proposed redline revisions of all three intervenors – SWEPCO, ELL, and Cleco Power.

IV. Commission Consideration

This matter was considered at the Commission’s March 18, 2026 Business & Executive Session. On motion of Vice Chairman Coussan, seconded by Chairman Skrmetta, and unanimously adopted, the Commission voted to accept Staff’s Recommendation on Final Rules filed into the record on February 13, 2026.

THEREFORE, IT IS ORDER:

1. Staff’s Final Rules filed into the record on February 13, 2026, and attached hereto as Attachment A, are adopted.
2. This Order is effective immediately.

BY ORDER OF THE COMMISSION
BATON ROUGE, LOUISIANA
April 14, 2026



A handwritten signature in blue ink, appearing to read "Brandon M. Frey".

BRANDON M. FREY
SECRETARY

/S/ ERIC F. SKRMETTA

DISTRICT I
CHAIRMAN ERIC F. SKRMETTA

/S/ JEAN-PAUL P. COUSSAN

DISTRICT II
VICE CHAIRMAN JEAN-PAUL P. COUSSAN

/S/ FOSTER L. CAMPBELL

DISTRICT V
COMMISSIONER FOSTER L. CAMPBELL

/S/ MIKE FRANCIS

DISTRICT IV
COMMISSIONER MIKE FRANCIS

/S/ DAVANTE LEWIS

DISTRICT III
COMMISSIONER DAVANTE LEWIS

**ATTACHMENT A
VEGETATION MANAGEMENT PILOT PROGRAM**

**LOUISIANA PUBLIC SERVICE COMMISSION
VEGETATION MANAGEMENT PILOT PROGRAM**

PURPOSE

Vegetation related outages are a major contributor to customer interruptions in Louisiana. The Louisiana Public Service Commission (“Commission” or “LPSC”) hereby promulgates the following rules to establish a vegetation management pilot program available to electric utilities owning distribution within the state and subject to the jurisdiction of the Commission (“Pilot”).

This Pilot is intended to allow electric utilities the ability to contemporaneously recover incremental increases in their respective vegetation management spending up to the utility’s distribution-level vegetation management expense for the 2025 calendar year. This Pilot is created to promote accelerated spending on vegetation management over a pilot period of no longer than 2-years and 9-months and to study whether such accelerated spending, and related recovery, provides additional reliability benefits, reduces storm damage, and thereby reduces customer interruptions. As such, this Pilot shall become effective between the time period April 1, 2026 and July 1, 2026 until December 31, 2028. The effective date will vary by utility.

AUTHORITY

Article IV, Section 21 of the Louisiana Constitution of 1974 provides the Commission with the following authority:

B. **Powers and Duties.** The Commission shall regulate all common carriers and public utilities and have such other regulatory authority as provided by Law. It shall adopt and enforce reasonable rules, regulations and procedures necessary for the discharge of its duties, and shall have other powers and perform other duties as provided by Law.

Consistent with the above authority, the Commission has adopted rules and regulations that apply to utilities in general, and in some cases electric utilities specifically. These rules and regulations are contained in individual Commission Orders memorializing the rules and regulations. The blanket authority to regulate public utilities granted above, however, is not absolute, as it is subject to the following limitations regarding utilities owned, operated or regulated by a political subdivision:

C. **Limitation.** The Commission shall have no power to regulate any common carrier or public utility owned, operated, or regulated on the effective date of this constitution by the governing authority of one or more political subdivisions, except by the approval of a majority of the electors voting in an election held for that purpose; however, a political subdivision may reinvest itself with such regulatory power in the manner in which it was surrendered. This paragraph shall not apply to safety regulations pertaining to the operation of such utilities.

In addition to providing the Commission with authority to regulate public utilities, Art. IV § 21 sets forth, in general terms, requirements a public utility must comply with regarding rate schedules. The Constitution also outlines the time frame in which such filings are to be processed, providing as follows:

D. Applications, Petitions, and Schedules; Protective Bond and Security.

(1) Within twenty days after a public utility files a proposed rate schedule which would result in a change in rates, it shall give notice thereof by publication in the official state journal and in the official journal of each parish within the geographical area in which the schedule would become applicable. (2) Within twelve months after the effective filing date, the Commission shall render a full decision on each application, petition, and proposed rate schedule. (3) After the effective filing date of any proposed schedule by a public utility which would result in a rate increase, the Commission may permit the proposed schedule to be put into effect, in whole, or in part, pending its decision on the application for rate increase and subject to protective bond or security approved by the Commission. If no decision is rendered on the application within twelve months after such filing date, the proposed increase may be put into effect, but only if and as provided by law and subject to protective bond or security requirements, until final action by a court of last resort. (4) If a proposed increase that has been put into effect is finally disallowed, in whole or in part, the utility shall make full refund, with legal interest thereon, within the time and in the manner prescribed by law.

It is consistent with the above-cited Constitutional authority that the Commission adopts these Rules that are intended to apply to all Commission-jurisdictional electric public utilities.

SECTION 101. Definitions²

1. Commission/LPSC- The Louisiana Public Service Commission.
2. Customer- A (i) natural person or (ii) a single juridical entity, including any of its affiliated companies which are affiliated through common ownership, who receive, and pay for, Service from an Electric Utility.
3. Customer Bills – For purposes of this Pilot only, Customer Bills is the Utility’s annual average monthly bill for calendar year 2025, including all cost recovery components, for a residential customer of the Utility using 1,200 kWh per month.
4. Electric Utility/Utility- any person furnishing electric Service within this state, the parish of Orleans excepted, including any electric cooperative transacting business in this state, provided, however, that said term shall not be construed to apply to any person owning, leasing and/or operating an electric generation facility provided such person is not primarily engaged in the generation, transmission, distribution, and/or sale of electricity, and provided that such person: (a) consumes all of the electric power and energy generated by such facility for its own use at the site of generation or at some other location if mutually acceptable agreements to transport such electric power and energy can be reached with each electric public utility whose transmission facilities would be electrically utilized therefor, provided, however, notwithstanding any provision contained herein, there shall be no obligation or duty, expressed or implied, to purchase, to sell, to transport, or to engage in any other type of transaction with respect to the electric power and energy that may be generated by such person, imposed upon any public utility by this Section except as shall be provided in the cogeneration rules and regulations adopted by the Louisiana Public Service Commission pursuant to the Public Utility Regulatory Policies Act of 1978; or, (b) only consumes a portion thereof in such manner and sells the entire remaining portion of such electric power and energy generated to an electric public utility as herein defined; or, (c) sells the entire production of electric power and energy generated by such facility to an electric public utility as herein defined. Notwithstanding anything to the contrary, an Electric Utility shall not include any Municipal entity providing electric service to its citizens, unless it elected to be regulated by the Commission pursuant La. Constitution Art. 4 Section 21(C).

² The definitions contained herein, except for Customer Bills, are those contained in Commission General Order dated July 1, 2019 (LPSC Docket No. R-34738, In re: *Proceeding to Establish Rules Regarding Electric Utility Tariff Filings and Related Review, Including Site Specific Rate Filings*) and are intended to avoid conflicting definitions for jurisdictional electric utilities. As such, should General Order dated July 1, 2019 be amended to reflect additional or revised definitions, such revisions will also be applicable to this Pilot with this General Order also being amended to reflect said revisions.

5. Rate- Any compensation, charge, fare, toll, rental, or classification that is observed, charged, or collected by an Electric Utility for a Service, product, or commodity it provides as allowed by law.
6. Rate Rider- A Rate Rider is an additional Rate or charge to be applied to a Customer bill that is separate and distinct from the basic Rates paid under the Customer's applicable Rate Schedule. Typically, Rate Riders are applied to more than one Rate Schedule, although that is not a requirement.
7. Rate Schedule(s)- A schedule(s) included within an Electric Utility's Tariff, which provides the various Rates for particular classes for which the utility anticipates offering Services under. Each specific Rate Schedule shall include: 1) Type of electric Service provided under the Schedule; 2) Rates and charges associated with Service under the Schedule; 3) All classification(s) of Customers which could be included under the Schedule; and 4) All practices, rules or regulations which specifically apply to the Services under the Schedule.
8. Standard Spending- For purposes of this Pilot only, Standard Spending is the level of spending that equates to no less than 95% and no more than 100% of the 2025 base year distribution-level vegetation management spending for each Utility, but excludes: any interim vegetation management spending approved by the Commission; costs incurred due to named storms, and; for Utilities operating in multiple states, spending for vegetation management conducted outside the State of Louisiana. The Commission reserves the right to alter the Standard Spending for a utility based on a finding that the 2025 spending does not appropriately capture the true standard spending of the Company as viewed over a longer historical period.

SECTION 201. Applicability of Pilot; Commission Approval

This Pilot is voluntary, available to all jurisdictional Electric Utilities who own distribution lines within Louisiana, and shall only be utilized for distribution-level vegetation management costs for work completed in Louisiana.

If a Utility chooses to participate in the Pilot, the Utility shall maintain its 2025 Standard Spending on vegetation management while also utilizing the cost recovery mechanism of the Pilot to recover incremental spending beyond their Standard Spending. No Electric Utility shall utilize this Pilot while also decreasing its 2025 Standard Spending on vegetation management. Should a decrease in 2025 Standard Spending occur, the Commission may find such actions are imprudent and find that an Electric Utility is no longer eligible for participation in the Pilot and/or require a refund under the true-up mechanism discussed in Section 501 below. The Commission may also adjust Rider recovery to appropriately reflect any over-recovery through other ratemaking mechanisms based on an Electric Utilities failure to spend its Standard Spending during the appropriate review period.

The Pilot shall be established for up to a 2-year and 9-month term beginning between April 1, 2026 through July 1, 2026 (inclusive) and terminating on December 31, 2028. At the end of the Pilot, the Commission, in conjunction with the Electric Utilities, will evaluate the efficacy of the Pilot and determine whether it should be extended. In conducting such evaluation, Staff will consider the data maintained pursuant to Commission General Order dated April 30, 1998.³

No Utility shall implement a Rider, or Rate under an existing Rate Schedule, pursuant to this Pilot until Commission Staff has approved said Rider, or update under an existing Rate Schedule, in accordance with Section 401 below.

SECTION 301. Cost Recovery under Pilot

The Rider, or Rate under an existing Rate Schedule, shall propose the Utility's recovery mechanism for the amount of incremental distribution-level vegetation management spending in an amount up to 100% of the Utility's 2025 Standard Spending on distribution-level vegetation management. In determining a Utility's 2025 Standard Spending on distribution-level vegetation

³ LPSC Docket No. U-22389, In re: *Ensuring Reliable Electric Service*.

management, the Utility shall not include any interim, or special, spending allowed during the 2025 base year.

In addition to the Rider recovery cap of an amount not to exceed the 2025 Standard Spending, the Utility's Rider recovery under the Pilot shall also not exceed 1% of Customer Bills, as that is defined in Section 101 above.

For 2026, Utilities shall limit their Rider recovery to a pro-rata share of its 2025 base distribution-level vegetation management spend commensurate with the start date of the Pilot. As an example, if the Utility begins its Pilot on April 1, 2026, the Utility shall only recover nine-twelfths (9/12) of its 2025 Standard Spending on distribution-level vegetation management in 2026.

SECTION 401. Process for participating in Pilot

For any Electric Utility electing to participate in the Pilot, the Utility shall submit notice to Commission Staff within 45 days after an Order is issued establishing the Pilot.

The notice shall include, at a minimum:

- 1) The Utility's proposed Rider;
 - a. If the Utility is utilizing an existing Rider or Rate Schedule, the Utility shall indicate such in its notice.
 - b. All recovery under this Pilot shall be separately tracked regardless of the recovery mechanism used by the Utility.
- 2) The Utility's standard distribution-level vegetation management spending for 2025 for purposes of establishing the Standard Spending;
- 3) The Utility's distribution cost allocation by customer class for the Rider or existing Rate Schedule;
- 4) Proposed target areas, with a focus on areas expected to benefit the most from additional vegetation management, including explanation of why those areas were selected;
- 5) Estimated monthly residential customer bill impacts; and
- 6) Attestation that the proposed monthly charge under the Pilot does not exceed 1% of Customer Bills, as defined in Section 101, with support for the determination of Customer Bills.

A Utility's proposed Rider will be submitted pursuant to Commission General Order dated July 1, 2019, Section 501(C).

SECTION 501. Compliance filing

By January 31, 2027, all participating Electric Utilities shall make a filing with the Commission detailing the first year's pro-rata share of its 2025 base distribution-level vegetation management spending completed under the Pilot. This filing shall include: 1) the actual spend under the Pilot, including any true-ups for differences between actual spend and the amount recovered under the Pilot Rider, or existing Rate Schedule; 2) the target areas completed, and an explanation as to why those areas were completed if they are different than the areas originally proposed; 3) the amount of standard distribution-level vegetation management spend incurred during the same time period; and 4) any recognized benefits from the Pilot spending.

For all other years under the Pilot, all participating Electric Utilities shall make a filing with the Commission by January 31st of each subsequent year providing the following information regarding the immediate prior calendar year: 1) the actual spend under the Pilot, including any true-ups for differences between actual spending and the amount recovered under the Pilot Rider, or existing Rate Schedule, for that same time period; 2) the target areas completed, and an explanation as to why those areas were completed if they are different than the areas originally proposed; 3) the amount of standard distribution-level standard vegetation management spend incurred during the same time period; 4) a comparison to the prior year in terms of spending, circuit miles trimmed, and outage causes attributed wholly or partly to vegetation; and 5) any recognized benefits from the Pilot spending.

Upon review of each compliance filing, should Staff question whether the Utility's recovery under this Pilot: 1) exceeded the amount of the Utility's 2025 Standard Spending; 2) has resulted in an increase in Customer Bills of greater than 1%; or 3) the Utility's Standard Spending was achieved during the same timeframe of review, Staff has the ability to request additional information from the Utility, with the Utility fully cooperating. Should Staff confirm that spending/recovery under the Pilot exceeded the Utility's 2025 Standard Spending, that Customer Bills have increased greater than 1%, or that the Utility's level of spending during the same timeframe did not meet or exceed its Standard Spending, a refund shall be provided via the Utility's true-up mechanism, dollar-for-dollar, in its respective Rider for the excess. If the Rider is no longer in place, such refund may be provided through the Electric Utility's Formula Rate Plan ("FRP"), or other base rate mechanism, so long as the refund is provided on a dollar for dollar basis.

These filings will be made into an X-Docket opened for purposes of collecting and housing all Electric Utility filings made pursuant to these rules.

SECTION 601. Staff's Review and Audit

Review of Notice & Rider: Commission Staff shall review a Utility's Notice and proposed Rider, or existing Rate Schedule, to ensure it complies with the rules contained herein, provides the requisite information to identify targeted areas, and to confirm the Utility's proposed budget and rates are consistent with these rules. Commission Staff shall provide each Utility with either a letter confirming the proposed Rider, or existing Rate Schedule, conforms with the rules herein or rejecting the proposed Rider, or existing Rate Schedule for not conforming. The Commission reserves the right to alter the Standard Spending for a utility based on a finding that the 2025 spending does not appropriately capture the true standard spending of the Company as viewed over a longer historical period.

Compliance Reviews: Commission Staff shall review each compliance filing made by the Utilities to ensure compliance with these rules, including that each Utility's Rider recovery has not exceeded the caps established herein. Commission Staff has the ability to request additional information from a Utility based upon information contained in the Utility's compliance filing, and the Utility shall cooperate fully with Staff's requests.

Formula Rate Review: During each participating Utility's Annual Review under its respective FRP, should the Utility have an FRP, Commission Staff will confirm that the Utility is appropriately implementing the Rider and that any true-up amounts identified in the Utility's compliance filing, including any necessary refunds, are being provided appropriately.

Prudence Review: At the end of the Pilot's term, December 31, 2028, Commission Staff will conduct a prudence review of the respective participating Utility's spending under this Pilot. Should the Commission decide to extend this Pilot, Staff shall still conduct a prudence review at the end of the first term, unless directed otherwise by the Commission in renewing the Pilot.

Section 701. Records, Records Keeping

Each Utility's Pilot, and associated Rider, are subject to review at the Commission's discretion, and records should be maintained in sufficient detail to permit an audit and evaluation. Records should be maintained for a period of at least 3 years from the end of the Pilot in order for Staff to conduct a review and audit, as described in Section 601 above. To the greatest extent possible, any information or workpapers provided by the Utilities to the Commission or Staff should be provided with all formulas and assumptions included, without hard-coded values.

Section 801. Renewal

At the end of the Pilot, the Commission reserves it right to extend the Pilot. Such extension could be for another set term, or could extend with modifications to the rules contained herein.