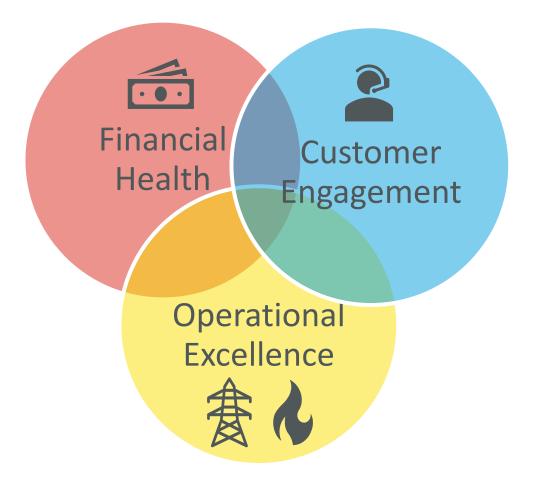
Operational Efficiency Review of CPS Energy

PREPARED BY: DAYMARK ENERGY ADVISORS PREPARED FOR: CPS ENERGY DATE: FEBRUARY 27, 2023



CPS Energy operational review scope

Daymark reviewed and analyzed CPS Energy from three perspectives.





Historically positive outcomes

- Competitive rates
- Good standing with credit agencies
- Good electric reliability performance
- Revenue from surplus generation capacity
- Growing customer base
- Significantly engaged with and in the community



* ERP stands for Enterprise Resource Planning

Challenges CPS is changing to address

- ERP
- Winter Storm Uri costs
- Decarbonization Supply Objectives
- Pandemic Past Due Balances
- Rebuilding and up-skilling staffing levels



Key recommendations broadly affecting the CPS Energy organization



Key risks

 Technology transition: Necessary, but also high risk and resource intensive.

Recommendations

- Focus on balancing the risk of end-of-life software with the risk of managing execution of new technology in a risk mitigation plan.
- Short-term resource constraints: Demands on CPS Energy's staff will grow with the technology transition. Meeting and maintaining staffing goals will be critical.
- Prioritize attracting, sustaining, and up-skilling staffing to goal levels to support CPS Energy priority objectives.

- Long term financial sustainability: Costs of rate increases, supply portfolio transition, technology transformation, and other costs to provide adequate resiliency will add up over the long term.
- Work with the Board to develop scenarios and contingency plans for implementation of Vision 2027 (and a few years beyond) to assess and manage this macro risk.



Key recommendations for Financial Health



- CPS Energy is in **stable financial position with a debt capitalization ratio comparable to other peer utilities** despite the growth in overdue customer accounts. CPS and the Board should continue their efforts in this area. If necessary, growth in overdue customer accounts should be **considered in future rate increases.**
- CPS Energy existing end-of-life software and systems are hindering operational efficiency and make internal controls more difficult to implement and monitor. The Board of Trustees should exercise due diligence in its oversight to help to make the transition successful.
- CPS Energy should work with the Board to build on Vision 2027 to develop a medium- and long-term financial strategic planning process separate from the budget and rate request processes.



Key recommendations for Electric Operations



- Utilize circuit-level and root cause type reliability data to refine system investment strategy and document within the Reliability and Power Quality Report.
- Undertake an analysis of contracted resource usage within the electric operational units; we suggest one goal of such a review to be the establishment of decision criteria pertaining to outsourcing strategy.
- The Board and management should establish metrics which allow management and stakeholders to track the achievement of benefits that the grid modernization / OT / SCADA* set of investments are intended to deliver.
- **Resolve technological barriers** to acting on circuit-level asset condition work orders.
- Develop a major outage restoration plan to establish necessary investments, practices and procedures.
- Expand the justification and benefits descriptions for balancing O&M and noncritical projects within capital planning process.
- CPS Energy staff are actively engaged in ERCOT* stakeholder processes; however, CPS
 Energy should consider whether there are ways to enhance internal processes to
 ensure CPS Energy reaps the full potential benefit of this engagement.

* ERCOT stands for Electric Reliability Council of Texas

* OT stands for operational technology; SCADA stands for Supervisory Control and Data Acquisition



Key recommendations for Gas Operations



- Develop a more formal written winter season management plan, including investments, practices and procedures, and automated reporting to executive management.
- Due to recent investment in new technology, we recommend, in addition to the existing gas metrics, establish a Tier 1 Metric that tracks industry standard leaks that remain open for repair at year end with the objective that this will be limited to those identified within the last 45 days.
- Investigate adding to Gas division staff: a preliminary review indicates this can be done cost effectively to support Tier 1 metric.
- Develop and/or partner with workforce organizations to create an in-house training program to attract more junior employees cost-effectively.



Key recommendations for Customer Engagement



- Establish a three to five-year plan for customer engagement budget, staffing, and improved data gathering and analytics.
- Commit to ERP* specifications that support the tasks necessary to improve customer data gathering, storage, and analytics.
- Rework customer satisfaction related surveys to make detailed customer segmentation analysis possible.
- Integrate energy efficiency, customer sited renewables, energy burden programs into resource planning processes and rate design to determine right-size funding while assuring energy equity.



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DAYMARK ENERGY ADVISORS

Our team brings deep knowledge and an integrated view of energy infrastructure, regulation, and markets to help our clients succeed in the face of uncertainty and transformative change.

