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14 IN THE PUBLIC UTILITIES COMMISSION
15 OF THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

16 **PETITION OF THE COMMONWEALTH
17 UTILITIES CORPORATION:**

18 **FOR ELECTRIC, WATER, AND WASTE-
19 WATER RATE RELIEF AND RELATED
20 MATTERS**

DOCKET NOS. 26-01 AND 26-02

**CUC SUPPLEMENTAL FILING OF A
3-YEAR RATE PLAN FOR FULL
COST RECOVERY**

Filing Date: August 21, 2026

22 **SUMMARY**

23 Petitioner Commonwealth Utilities Corporation (“CUC”), a publicly owned corporation
24 within the Commonwealth of the Northern Mariana Islands (“CNMI”), through its undersigned
25 attorneys, hereby submits this supplemental filing to the Commonwealth Public Utilities
26 Commission (“CPUC” or “Commission”) to supplement its Application for Rate Relief, which
27 was filed on October 31, 2025 and accepted by the Commission on January 22, 2026.
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1 CUC hereby presents to the Commission a 3-year rate plan for full cost recovery as an
2 alternative to the 5-year rate plan originally presented in the Application for Rate Relief. This
3 supplemental filing of a 3-year rate plan is made pursuant to 4 CMC § 8141(c), which provides
4 that any rate structure adopted by the CUC Board of Directors should be sufficient to recover the
5 costs associated with the operation and delivery of utility services “within three complete fiscal
6 years.”¹

7 **EXHIBITS**

8 CUC seeks a change in electric, water, and wastewater rates, and an increase in certain
9 fees and charges. The following exhibits model a **three (3) year rate plan** which would
10 gradually increase CUC’s rates on an annual basis so that by 2029 CUC’s electric, water, and
11 wastewater rates will recover the full cost of service.

12 **CUC Exhibit 8 – 3-Year Rate Plan**

- 13 ○ **Appendix A** – Economists.com’s PowerPoint Presentation Summarizing the
14 Proposed 3-Year Rate Plan.
- 15 ○ **Appendix B** – Summary Schedules in PDF Format Outlining the Proposed 3-
16 Year Rate Plan and Its Impact on Annual Revenues and Expenses for Electric,
17 Water, and Wastewater.
- 18 ○ **Appendix C** – CUC’s Comprehensive Electric, Water, and Wastewater Rate
19 Model for the Proposed 3-Year Rate Plan in Executable (XLS) Format.

20 CUC respectfully notes that the only change from the previously-submitted 5-year rate
21 plan is the consolidation of the rate plan from five years to three years for full cost recovery. All
22 previous assumptions and analyses regarding expenses, customer accounts, volumes, and other
23 model inputs remain unchanged.

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26 ¹ CUC takes no position on whether 4 CMC § 8141(c) unlawfully usurps, weakens, or
27 otherwise contradicts the broad power of the Commission to set reasonable rates within the
28 Commission’s sound discretion. *See, e.g.,* 1 CMC § 8411(a) (“The Commission *shall* . . .
regulate *all* rates, fares, fees, charges[.]”) (emphasis added). CUC submits this supplemental
filing so as to be fully compliant with all CNMI laws as they currently exist.

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CONCLUSION AND REQUESTED RELIEF

CUC respectfully requests that the Hearing Administrator accept this supplemental filing into the record and establish any appropriate opportunity for review and response.²

Dated: August 21, 2026

Respectfully submitted,

/s/

By: _____
Michael L. Ernest (F0317)
Attorney for Commonwealth Utilities Corporation /
Special Assist. Attorney General

/s/

By: _____
Bao-Ngan (“Tina”) Vy Ngo (T0177)
OFFICE OF THE ATTORNEY GENERAL
Attorney for Commonwealth Utilities Corporation

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² Nothing in this filing waives any existing CUC claim, argument, objection, or requested relief. CUC respectfully reserves the right to supplement this filing with further witnesses, testimony, and exhibits at the public hearing on this matter as ordered by the Commission or upon request of the Commission.