BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF OKLAHOMA GAS AND ELECTRIC COMPANY FOR COMMISSION APPROVAL OF ELECTRIC SERVICE AGREEMENTS AND PREAPPROVAL OF CAPACITY PURCHASE AGREEMENTS PURSUANT TO 17 O.S. § 286(C)	))))))	Case No. PUD2026-0000___

APPLICATION

COMES NOW Oklahoma Gas and Electric Company ("OG&E," "Applicant," or "Company"), pursuant to Article IX of the Oklahoma Constitution, 17 O.S. §§ 152, 153 and 286(C), and respectfully submits this Application requesting Commission approval of certain Electric Service Agreements and pre-approval of two Capacity Purchase Agreements, and in support thereof states as follows:

I. PARTIES:

OG&E is an investor-owned electric public utility with plant, property, and other assets dedicated to and for the generation, production, transmission, distribution, and sale of electric power at retail levels within the states of Oklahoma and Arkansas. OG&E is incorporated within the State of Oklahoma, is subject to the regulatory authority of this Commission with respect to its retail rates and charges within the State of Oklahoma, and has the following address as its principal place of business:

Oklahoma Gas and Electric Company
321 N. Harvey Avenue
Oklahoma City, Oklahoma 73102

Applicant is represented in these proceedings by the below signed counsel. All correspondence, pleadings and communications with respect to this proceeding should be directed to all named counsel.

II. FACTS:

A. Overview of the Proposed Business Arrangement

1. OG&E has executed three Electric Service Agreements ("ESAs") with Alliance Site & Grid, LLC, a wholly-owned subsidiary of Google (hereinafter "Google"), for the provision of retail electric service to be located within Oklahoma.

2. The three ESAs are substantially similar in form and structure and establish site-specific terms governing contract demand, service timelines, and infrastructure requirements necessary to serve the facilities.

3. The facilities represent significant new investments in the State of Oklahoma and a significant new load on OG&E's system. Serving this load requires bespoke contractual provisions to ensure reliable service while protecting existing customers from adverse rate impacts.

B. Customer Protections Embedded in the ESAs

1. The ESAs include extensive customer protection provisions designed to ensure that existing OG&E customers are not exposed to stranded costs, cost shifting, or undue financial risk. These provisions include, among other things:

i. Long-term contract commitments;

ii. Minimum billing demand and energy charges;

iii. Significant credit support and parental guarantees;

iv. Early termination and capacity-reduction exit fees;

v. Funding by Google of all dedicated transmission and distribution infrastructure through Contributions in Aid of Construction ("CIAC"); and

vi. Provisions recognizing Commission authority to review and address any potential adverse rate impact in future rate proceedings through cost-of-service adjustments.

2. In addition, the ESAs provide for tariff-based pricing and contemplate potential migration of the Google load to a future Commission-approved large load tariff, if applicable.

C. Capacity Needs and Capacity Purchase Agreements

1. OG&E's most recent Integrated Resource Plans demonstrate a growing need for additional generation capacity to meet forecasted load growth and Southwest Power Pool ("SPP") reserve requirements.

2. To help address a portion of this capacity need in a cost-effective manner, OG&E has entered into two long-term Capacity Purchase Agreements ("CPAs") with Google under which OG&E will purchase accredited capacity from two solar generation facilities located within OG&E's service territory.

3. The long-term CPAs provide for firm delivery obligations, include alternative facility protections, and are priced at a fixed rate that is materially below comparable capacity prices observed in OG&E's 2024 All-Source Request for Proposals.

D. Statutory Basis for CPA Pre-Approval

1. OG&E seeks pre-approval of the CPAs pursuant to 17 O.S. § 286(C), which authorizes the Commission to pre-approve capacity resources where the Company demonstrates:

i. A need for additional capacity;

ii. Consideration and evaluation of reasonable alternatives; and
iii. That the selected resource represents the lowest reasonable cost option that is used and useful in providing electric service.

2. As demonstrated in the testimony filed contemporaneously with this Application, the CPAs satisfy each of these statutory requirements.

E. Cost Recovery

1. OG&E requests authorization to recover the costs associated with the CPAs through its Fuel Adjustment Clause ("FCA"), consistent with Commission precedent and the recovery mechanism approved for other long-term CPAs, including those approved in Case No. PUD 2025-000038.

III. LEGAL AUTHORITY:

The Commission has jurisdiction in this proceeding by virtue of Okla. Const. Art. IX, § 18 and 17 O.S. §§ 152, 153 and 286(C).

IV. RELIEF REQUESTED:

WHEREFORE, OG&E respectfully requests that the Commission, after notice and hearing, issue an order:

A. Approving the three Electric Service Agreements between OG&E and Google as special contracts;

B. Pre-approving two Capacity Purchase Agreements pursuant to 17 O.S. § 286(C);

C. Authorizing recovery of CPA costs through OG&E's Fuel Adjustment Clause; and

D. Granting such other and further relief as the Commission deems just and reasonable.

OG&E respectfully requests the Commission issue an order granting the requested relief by October 31, 2026.

Respectfully submitted,

A. Chase Snodgrass, OBA No. 33275
OKLAHOMA GAS & ELECTRIC COMPANY
321 N. Harvey Ave. M/C 300
Oklahoma City, OK 73102
(405) 553-3129
snodgrcc@oge.com
reginfor@oge.com

-and-

Deborah R. Thompson, OBA No. 16700
Kenneth A. Tillotson, OBA No. 19237
THOMPSON TILLOTSON PLLC
P.O. Box 54632
Oklahoma City, Oklahoma 73154
(405) 213-1000
deborah@ttfirm.com
kenneth@ttfirm.com

ATTORNEYS FOR OKLAHOMA GAS AND ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May 2026, a true and correct copy of the foregoing was electronically served via the Electronic Case Filing System to those on the Official Electronic Case Filing Service List, and via electronic mail to the following persons:

Oklahoma Corporation Commission
Mark Argenbright
Natasha Scott
Mike Ryan
Kyle Vazquez
E.J. Thomas
mark.argenbright@occ.ok.gov
natasha.scott@occ.ok.gov
kyle.vazquez@occ.ok.gov
michael.ryan@occ.ok.gov
ej.thomas@occ.ok.gov
pudenergy@occ.ok.gov

Oklahoma Attorney General
Thomas Grossnicklaus
Ashley Youngblood
Justin Cullen
Meghan Wan
thomas.grossnicklaus@oag.ok.gov
ashley.youngblood@oag.ok.gov
justin.cullen@oag.ok.gov
meghan.wan@oag.ok.gov
Utility.regulation@oag.ok.gov



A. Chase Snodgrass