Date Filed: September 23, 2026

Witness: John P. DiPaola-Tromba
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-1 at 55. Confirm whether the proposed bulk transformer replacements are proactive replacements rather than replacements of failed transformers. If not confirmed, identify each replacement that is required because of an existing failure, capacity constraint, or mandatory compliance requirement.

Response:

Exhibit CLP-TSP-1 beginning at page 55, discusses the Targeted System Plan including an average of eight bulk and distribution transformers with an investment of ~$78M per year. These transformers are discussed below.

The transformers included in the plan within this investment category are proactive replacements of units over 50 years old with asset health concerns. With a large portion of the transformer fleet being between 50 and 80 years old, as these transformers continue to approach and exceed 70 years, the rate of failure will increase rapidly. Due to the complexity and time duration of procuring and replacing transformers, a significant increase in failures would result in the inability to maintain reliability by reactively replacing an increased volume of transformer failures.

The Stevenson 14A Transformer Replacement project is an ongoing project included in the Targeted System Plan related to the failure of the 14A-1X transformer at the Stevenson 14A substation. There are no other projects included in the Targeted System Plan that are a replacement of a failed transformer.

The transformer projects identified for replacement because of an existing capacity constraint are included in the Substation Capacity/System Planning investment category.