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Witness: David L. Gladey, Lavelle Freeman, John P. Dipaola-Tromba, Jennifer A. Schilling, Elli Ntakou and Gerhard Walker
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-3 at 138, "Advancing the Grid, Planning Analytics - Advanced Forecasting Tools."

a. Please describe the milestones and timelines to integrate this tool into distribution planning if approved.
b. Please explain why existing forecasting tools cannot generate forecasted 8760 load shapes across all levels: substation, transformer, and at circuit levels

Response:

a. Based on the Company's experience, the procurement and deployment process will take 12-18 months from approval, and an addition 6 months to get the tools into full production.

b. Historically, time-series profile forecasts were not necessary to review capital projects and the single system peak was the most reliable forecast that could be produced. This is still valid today as the key input to capacity planning remains the magnitude of the peak, regardless of its time or date.

As iterated in the Company's responses to 21-05-15RE03 IDSP, there are also critical questions on the validity and cost benefit of creating an 8760 forecast as an 8760 forecast, by its very nature, not only forecasts the peak load and time of that peak load, but also the weather and load over the entire year.

While such profiles are useful for evaluating and sizing certain solutions (e.g., battery storage as an NWA, for which the Company can and does create 24-hour load profiles) they do not provide any incremental value for determining the scope of a substation project, and incur not insignificant incremental effort both on a technology and labor side. The Company has therefore not undertaken the full effort of creating such profiles given the incremental resources needed.

The existing tools the Company has in place were never designed nor intended to produce 8760 forecasts. This does not represent an insurmountable barrier but requires additional investments as the Company outlined in its comments to 21-05-15RE03 IDSP, which,

without there being any documented proof in either proceeding that 8760 forecasts would quantifiably benefit the customer in a manner offsetting additional costs, requires the Authority to lay out cost recovery pathways for such efforts.