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Witness: Douglas P. Horton, Digaunto Chatterjee, Lavelle A. Freeman, Juan Martinez, and Gerhard Walker
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-3 at 101-106, "Non-Wires Alternative Projects, Eversource Battery Storage NWA Projects for Substation Capacity Relief".

a. What is the status of the non-wires alternative projects for Campville 14R and Frybook 14B?
    i. Have these projects been procured and are they in-service?
    ii. Is the Company seeking cost recovery for implemented projects or approval for proposed projects?
b. Please describe what DER control approach (e.g DERMS) the Company has or plans to use to dispatch battery storage.
c. Are the battery storage NWAs utility or third party owned?
d. Please describe the BCA methodology including the types of benefits quantified for the cost-effectiveness supplemental analysis.

Response:

a. i. These projects are still in conceptual status with an internal initial funding request approved. These projects have not yet undergone a full study and solution selection process. As part of this process, the NWA will be revaluated against other solutions to determine the final proposal.

    ii. These projects have not been implemented. The Company has included funding for the system needs driving these projects within the Sustained Performance capital program found on page 49 of exhibit CLP-TSP-1. As described elsewhere in this filing, the Company's proposed PBMRP plan is intended to provide revenue support for ongoing capital expenditures through application of the F-Factor in the PBMRP, subject to periodic and ongoing prudence reviews, application of the F-Factor cap, and downward-only reconciliation in the event actual overall plant-in-service is less than the capital expenditure forecast presented in Exhibit CLP-TSP-3.

b. If the NWA solution is selected for either project location, the Company will then determine DER controls during the detailed engineering stage.

c. The Company intends to operate the battery as the owner of the asset per PURA's Docket 24-08-08 Final Decision.[1]

However, the Company would solicit proposals through a formal RFP process on a battery storage solution from 3rd party vendors in order to implement the solution at the best available market pricing.

d. The benefit-cost model includes the costs and benefits associated with each project Campville14R and Fry brook 13B:

- Costs represent estimated Project costs and estimated Energy Markets revenues
- Benefits include:
  - Distribution Benefits: these benefits are associated with deferral of traditional distribution upgrade cost by targeting discharge as needed to resolve the localized distribution constraints.
  - System benefit: these benefits are related to ESS discharges targeting ISO system peak, which will result in Energy and Capacity benefits derived from the Avoided Energy Supply Cost.

[1] https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/0bb69f312fc7124085258bf7005581c5/$FILE/240808-121824.pdf