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

**Question:**

Refer to Exhibit CLP-TSP-3, at p. 11. In the table, The Targeted System Performance column is blank for Substation Capacity, DER Enablement, Substation Transformer Replacements per Year, Average Fleet Age in 2040, and Oldest Unit in 2040. Provide the value for each of those rows under the Targeted System Performance tier.

The Sustained tier and the Targeted System Performance tier both expecting one transformer failure per year starting in 2030, both showing Grid Mod average annual impact of $14 million, and both showing vegetation management of $91 million per year starting in 2028. State what the incremental $374 million changes in each of those three measures.

**Response:**

Exhibit CLP-TSP-3, at p. 11, rows are blank for Substation Capacity and DER Enablement as there are no incremental investments specifically for substation peak load/capacity projects under the Targeted System Performance plan. As shown in Exhibit CLP-TSP-3, at p. 93-95, all substation peak load/capacity projects are either in the (current) 2026 Plan or the Sustained Performance Plan.

The row of information noted for Substation Transformer Replacements/Year in the Advancing the Grid column was incorrectly placed and should have been noted under the Targeted System Performance plan. These incremental funds of $15M per year starting in 2030 support the increase of the average quantity of transformer replacements from six to eight units per year. The increased quantity of replacements reduces the risk of aging transformers failing and creating abnormal system conditions and customer impacts. Lowering the risk enables the reduction in the funding necessary to cover transformer failures starting in 2030 and allows this funding to be diverted into other areas of need within the asset health portfolio.

The $374M changes in the investment plans from the Sustained tier to the Targeted System Performance plan do not include any proposed changes to the investments for Substation Capacity, DER Enablement, Grid Mod, or Vegetation (O&M).