Date Filed: September 16, 2026

Witness: Andrew C. Belden and Justin Pelkowski
Request from: ALLCO

Question:

For each year 2020 through 2025, state the extent to which the output of distribution-connected resources under five megawatts reduced (or, if registered, did not reduce) the loads and billing determinants for which the Company's customers bear costs, including: (a) the Company's reported real-time load obligation in ISO-New England; (b) the monthly coincident peaks used to determine Regional Network Service, Local Network Service, and Transmission Adjustment Charge amounts (the "12-CP" determinants); (c) the Company's capacity load obligation and installed capacity requirement; and (d) reserve and ancillary charges; and quantify, in dollars per year, the reduction in each such cost category attributable to such resources, or produce the data sufficient to make that calculation. If the Company contends such resources produce no such reductions, explain why.

Response:

PURA's June 2, 2026, Notice of Proceeding in Docket No. 26-05-10 states that, upon a receipt of a completed application from Eversource to amend the Company's existing rate schedules, PURA will conduct a contested proceeding to review Eversource's application. Eversource objects to Allco's effort to litigate an issue that is outside the scope of this rate case proceeding. Considering the statutory 350-day timeframe to issue a final decision on the Company's application and the number of interrogatories issued in this proceeding to-date, the litigation of issues irrelevant to the Company's application threatens to adversely impact the orderly conduct of this proceeding.[1]

Without waiving said objection, distribution-connected resources under 5 MW reduce the load and capacity supply obligations of all load serving entities. They also reduce the peak load amounts, which are the basis by which the shared costs of regional transmission resources are allocated.

The ultimate impact of distributed generation on these determinants and cost categories is dependent on multiple factors. For example, the generation output of distributed generation during the actual monthly system peak is insufficient to determine the impact. It would also be necessary to determine what the monthly system peak would have been in the absence of distributed generation. Calculating the impact on wholesale and regional transmission costs would also require identifying what applicable wholesale and RNS rates would have been in the absence of

[1] Allco previously litigated renewable energy projects as load reducers in the Company's Docket No. 24-01-03 Revenue Adjustment Mechanism proceeding. See, Docket No. 24-01-03, Eversource responses to ALLCO-04 and ALLCO-027. Eversource objected to both of these questions.

distributed generation. The Company does not possess this counterfactual data necessary to make the requested calculations.