Date Filed: September 04, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, and Steven C. Osuch
Request from: ALLCO

Question:

Produce the "preliminary analysis" referenced in Exhibit CLP-TSP-3 at 144 supporting the proposed "Avg. Interconnection Fee: < $500/kW," and the workpapers supporting the prospective SHARE fees of $392/kW (Tracy 14M group), $308/kW (Frybrook 13B group), and $192/kW (Campville 14R group) and the associated total distribution investment estimates of $180 million, $30 million, and $65 million (Exhibit CLP-TSP-3 at 146-149).

Response:

The high-level planning estimates were produced utilizing historical project and unit costs for the preliminary anticipated scopes of these projects. As the SHARE program is a proposed concept, at this time, specific impact studies have not been completed, no level engineering has been performed, and therefore estimates are not available with any more detail than provided in this response. Following PURA's approval of the SHARE program and the proposed projects, engineering studies would be conducted to develop more detailed scopes and estimates, and project benefits, costs, viability and constructability would evaluated during our internal capital project review and approval process.

The SHARE fee represented in the testimony was produced with the following formula:

$$SHARE\ FEE\ in\ \$/kW = \frac{\text{Total DER Customer Benefit Upgrade Cost in \$M}}{\text{Estimated Enabled Commercial DER Capacity in MVA}} x1000$$

where 1000 represents the combined unit conversion of Millions of Dollars to Dollars and MVA to kW:

$$\$1000/kW = \frac{\$1{,}000{,}000}{1000\ \text{kW}}$$

In these calculations, kW and MW are used synonymously with kVA and MVA given the typical unity power factor of inverter-based generation while substation assets are rated in Volt-Amperes to account for both the apparent and reactive components of capacity of the equipment.
A breakdown of the components for the Tracy 14M Group SHARE fee is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Total Upgrade Cost
Distribution Station	$61.0M	$44M	$35M	**$140M**
Distribution Line	$24.5M	$7M	$9M	**$40M**
Total:	**$85.5M**			**$180M**
Enabled Capacity:	**218 MVA**			
SHARE Fee:	**$392 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$392/kW = \frac{\$85.5M}{218MVA} x1000$$

A breakdown of the components for the Frybrook 13B Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$9.1M	$11M	$0M	**$20M**
Distribution Line	$7.2M	$2M	$1M	**$10M**
Total:	**$16.3M**			**$30M**
Enabled Capacity:	**53 MVA**			
SHARE Fee:	**$308 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$308/kW = \frac{\$16.3M}{53MVA} x1000$$

A breakdown of the components for the Campville 14R Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$28.0M	$21M	$5M	$54M
Distribution Line	$8.1M	$2M	$1M	$11M
Total:	**$36.1M**			**$65M**
Enabled Capacity:	**188 MVA**			
SHARE Fee:	**$192 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$192/kW = \frac{\$36.1M}{188MVA} x1000$$