Date Filed: October 07, 2026

Witness: David L. Gladey, Lavelle A. Freeman, Steven Lamontagne, Steven C. Osuch, Edward A. Davis and Amparo Nieto
Request from: Office of Consumer Counsel

Question:

(ACOSS) Refer to Exhibit CLP-ACOS-1, page 6, lines 6:7, regarding the use of class NCPs.

a. Please explain whether a class's NCP accurately reflects the class's contribution to the capacity requirements for substations and feeders, which may peak at different times than the class.

b. Please explain whether the Company considered using more detailed class load data for each feeder and substation to more accurately allocate costs associated with each class's load during the peak hours for each feeder or substation. If yes, please explain why the Company did not use this method. If no, please explain why not.

c. For each of the Company's substations and feeders, please provide an Excel workbook with the 8760 load data for each of the past three years, as well as the feeder or substation name/number. If the requested data are not available, please provide the data that most closely match that requested (e.g., the date and time of the equipment's peak demand, as well as the maximum MVA demand for each of the last three years.)

d. Does the Company have the ability to provide class load data for each substation and/or feeder for each of the past three years? If yes, please provide this data in an Excel workbook. If not, please explain what would be required to provide this data.

e. Please provide the system 8760 load data for each class for each of the past three years in an Excel workbook.

Response:

a. Class NCP reflects the load diversity within each class. The class NCP allocator represents the maximum load placed by the class on the grid (e.g., transformer) during a given year, but not necessarily at the time when the asset reaches its maximum load, if said asset serves other classes. Thus, it is distinct from Coincident Peak (CP) allocators, which measure the share of each class load at the time of peak load on the equipment. Class NCP has been used in embedded cost studies as guided by NARUC for the demand-related share of transformer and cables. Class NCP does not accurately reflect each class's load ratio share at the time of the transformer/ feeder coincident peak. Instead, class NCP is intended to be a proxy to allocate cost responsibility of the capacity requirements of the plant. Class NCP only accurately represents class responsibility if the substation / transformer/ lines were

mostly designed dedicated to serve a single class. Given that this is very locational specific for the transformer and local conductors, class NCP was adopted to approximate the relative class responsibility on the cost/required size of the equipment, to introduce class diversity as compared to the individual customers' NCPs. This is because planners will take into account that there is diversity within the class.

b. The Company initially considered using an allocator for the top 50 hours representing highest coincident maximum demand on the distribution system (50 CP) calculated by Ms. Nieto from hourly system loads, for Station plant (Acc. 362) only. This allocator could more accurately allocate growth-related capacity costs driven by each class's load during the peak hours at substations. The Company ultimately decided not to adopt this method out of concerns of the streetlighting classes not receiving a reasonable allocation, of other costs not related to the peak hour, that could misallocate cost particularly for substations peaking in winter, since the top 50 hours occur in the summer months in daylight hours. The ACOS model, Allocator tab includes the 50CP allocator, and a summary comparing the 50CP with the hybrid 50CP/NPC and the class NCP allocator is provided in OCC-861, Attachment 7.

c. Please refer to OCC-861, Attachment 1 CONFIDENTIAL through OCC-861, Attachment 6 CONFIDENTIAL, for the information requested in subpart (c).

   i. OCC-861, Attachment 1 – Feeder Peaks
   ii. OCC-861, Attachment 2 – 2023 Circuit kW
   iii. OCC-861, Attachment 3 – 2024 Circuit kW
   iv. OCC-861, Attachment 4 – 2025 Circuit kW
   v. OCC-861, Attachment 5 – 23-25 SubTx kW
   vi. OCC-861, Attachment 6 – Substation Coincident Peak 23-25

   Please note that the Company does not identify the system peak by utilizing the systems raw 8760 data as peaks identified within this metered data may be transient situations such as planned or unplanned outages, switching, etc. For this reason the Company has also provided the coincident peak data within the data centers contained within these attachments.

d. The Company does not possess nor have the ability to provide this data. In order to obtain this data, each customer of each customer class would require AMI, at a minimum, as customer metered load would need to be synchronized to capture coincident loading on a particular feeder or circuit. With AMI, given the dynamic nature of real-time operations, loads would likely be aggregated based upon the customers' normal configuration which would not necessarily coincide with the real-time 8760 loading data of the feeder and substation level meter data.

e. As identified in the response to subpart (d) of this response, the Company does not possess this data.