Date Filed: September 22, 2026

Witness: Lavelle A. Freeman, Gerhard Walker, and Juan F. Martinez
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-2 at 21-22, "Historical System Load Analysis."

a. Please describe the temporal granularity (i.e hourly etc.) of the historical loading information used to inform the Company's load forecast and whether this varies depending on location and data availability.
b. Please describe the percentage of substations and associated feeders with available 8760 hourly profiles. If some or all of the substations and associated feeders do not have 8760 hourly profiles, please describe whether and when the Company plans to have 8760 profiles available.

Response:

a. To create the substation peak forecast the Company relies on the peak hour values which are determined from 15 min SCADA data by substation and at the system level.

b. Please refer to the Company's response to information request OCC-587[i]. The Company currently does not create 8760 load forecast profiles. Where SCADA data is available[1], the Company does have historical 8760 "as measured" data. The Company currently has no plans absent approval of requested resources as presented in the Exhibit CLP-TSP-3 at 138. Here, the Company has outlined a pathway to develop the resources needed for the full capabilities to provide 8760 data within 18 to 24 months.

Prior Referenced Response:

[i] OCC-587 Question:

Refer to Exhibit CLP-TSP-3 at 138, "Advancing the Grid, Planning Analytics - Advanced Forecasting Tools."

a. Please describe the milestones and timelines to integrate this tool into distribution planning if approved.
b. Please explain why existing forecasting tools cannot generate forecasted 8760 load shapes across all levels: substation, transformer, and at circuit levels

[1] Currently, all CT bulk transformers have available SCADA data.

OCC-587 Response:

a. Based on the Company's experience, the procurement and deployment process will take 12-18 months from approval, and an addition 6 months to get the tools into full production.

b. Historically, time-series profile forecasts were not necessary to review capital projects and the single system peak was the most reliable forecast that could be produced. This is still valid today as the key input to capacity planning remains the magnitude of the peak, regardless of its time or date.

As iterated in the Company's responses to 21-05-15RE03 IDSP, there are also critical question on the validity and cost benefit of creating an 8760 forecast as an 8760 forecast, by its very nature, not only forecasts the peak load and time of that peak load, but also the weather and load over the entire year.

While such profiles can be and are useful for evaluating and sizing certain solutions (e.g., battery storage as an NWA, for which the Company can and does create 24-hour load profiles) they do not provide any incremental value for determining the scope of a substation project, and incur not insignificant incremental effort both on a technology and labor side. The Company has therefore not undertaken the full effort of creating such profiles given the incremental resources needed.

The existing tools the Company has in place were never designed nor intended to produce 8760 forecasts. This does not represent an insurmountable barrier but requires additional investments as the Company outlined in its comments to 21-05-15RE03 IDSP, which, without there being any documented proof in either proceeding that 8760 forecasts would quantifiably benefit the customer in a manner offsetting additional costs, requires the Authority to lay out cost recovery pathways for such efforts.