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Witness: David L. Gladey, Lavelle Freeman, John P. Dipaola-Tromba, Jennifer A. Schilling and Elli Ntakou
Request from: Department of Energy and Environmental Protection

Question:

Refer to Exhibit CLP-TSP-1 pp. 29-30. The Company implies a change in the load growth pattern that is changing the investment needs. Please provide examples of this and identify, if possible, what is causing the growth and if the growth is happening in areas with a definable set of characteristics.

Response:

In the referenced section of CLP-TSP-1 the Company outlines a couple of key items:

1. Over the past decade, the Company has used all available methods to increase the load-serving ability of the distribution system by transferring loads from heavily loaded substations and circuits to neighboring infrastructure. On this point, it is important to note that load transfer between substations does not increase system capacity, but instead, actually diminishes operational flexibility by using transfer capacity intended for emergency conditions to serve load. Load transfer also increases area-wide constraints and risks by moving load to substations outside the natural service area and places the system in a less reliable, off-nominal configuration, compared to the native design. The result of these actions is that, over time, on large portions of the system, the Company is now faced with very little spare capacity and room to maneuver.

2. A compounding effect of Item #1, above, is that load growth, especially driven by larger commercial developments, such as shipping and storage facilities that require significant amounts of land, generally materializes in electrically weaker areas where the infrastructure design is a function of lower-demand rural use, which is now causing these types of substations to be loaded beyond respective thermal capacity limits very quickly. With the area electric system so constrained (as discussed in Item #1), the Company has limited maneuverability to accommodate large new loads and economic growth, which results in the need for substation upgrades to maintain safe, reliable operation of the system and provide the required quality of service for customers.

3. Another effect is that DER growth has developed in a proportionally inverse manner to load density and consequently to infrastructure strength and capacity. Land is the single largest indicator for large-scale solar development potential and land is cheap and abundant

in most areas where electric demand is low. This potentially leads to large amounts of generation injected into areas of the system that were not designed for the ensuing thermal capacity loading on distribution equipment.