Date Filed: September 22, 2026

Witness: Lavelle A. Freeman and Gerhard Walker
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-2 at 22-23, "Distributed Energy Resource Modeling" and "Electric Vehicle Forecasting."

a. Does the Company incorporate DER and EV flexibility potential into its load forecasts?
    i. If so, please describe what resources and flexibility assumptions are incorporated into the forecasts.
    ii. If not, please describe if and when the Company intends to incorporate DER and EV flexibility potential and assumptions into their forecasts.
b. Please describe any other flexibility assumptions the Company currently incorporates or plans to incorporate into their forecasts.

Response:

The term "flexibility" represents a general concept that can refer to demand management programs, EV charge management, TOU, existing or proposed/conceptual programs, targeted or statewide solutions, or customer flexibility as a standalone phenomenon with the introduction of new technologies.

The first distinction that must be made is between targeted and statewide programs and existing and proposed/conceptual programs. The forecast provides an overview of the system need (i.e., what the electric distribution and transmission system must be able to safely and reliably accommodate). In that forecast the Company considers impacts of DER (installed, in queue, and forecasted) and existing EE programs, such as demand response, that have shown quantifiable impact to system peaks. It does not consider anything above and beyond this, as anything that is not already in place is considered a solution to a need.

Charge management for electric vehicles in its current form relies on incentive payments to customers, a cost that must be considered for these programs. If the main benefit of such a program is to avoid transmission and distribution investments, the cost of the program must be considered against the infrastructure investments, especially as the program costs are yearly and ongoing. Placing such programs into the forecast would assume a foregone conclusion on the outcome of such an evaluation, and their efficacy.

Given the above context, the following are considered/not considered in the forecast:

Considered:

- Solar, installed, in queue, and forecasted
- Existing and funded EE programs and DR where they have shown consistent impact to peak

Not Considered:

- VPP dispatch of ESS
- Charge Management Programs

As stated above, the objective of the forecast is to demonstrate the system need, while flexibility options are, for the most part, solutions that incur actual costs. Unless programs are deployed statewide, funded, and have quantifiable and measurable impact to the peak, they are not considered in the forecast. The Company will incorporate any flexibility that meets those criteria in the forecast.