Date Filed: September 28, 2026

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

Question:

Refer to Exhibit CLP-AMI-2 at 3-4, "Several capabilities can be realized with the commencement of AMI meter deployment, including power outage restoration, bulk data sharing, energy efficiency and demand management analytics, load research, transformer load management analytics, unbilled usage detection, VVO analytics, and remote connect/disconnect functionality".

a. Please describe how the Company intends to enable these capabilities with the commencement of AMI including the following:
   i. Does the Company intend to activate and leverage these capabilities on a region-by-region basis as AMI is deployed?
      1. If so, please describe the anticipated phases and cadence of deployment in which capabilities will be iteratively activated?
      2. If not, please describe the Company's approach to realizing capabilities with the commence of deployment.
b. Please confirm whether green button connect along with bulk data sharing would be implemented iteratively as AMI deployment occurs.
c. As part of implementing transformer load management analytics, does the Company intend to leverage AMI to iteratively develop 8760 hourly profiles at the substation, circuit and nodal level that can be incorporated into distribution planning and operations?

Response:

a. No, these capabilities are not implemented on a region-by-region basis. These capabilities will be deployed to the meters as soon as all the foundational back-office technology is built. These capabilities will be available to customers as meters are installed and come online.

   Please refer to page 43 in CLP-AMI-2 for further proposed AMI program timeline on incremental AMI deployment.

b. Eversource confirms that Green Button Connect will be implemented iteratively as AMI deployment occurs. We further expect that bulk data sharing capabilities will likewise be implemented on an iterative basis as underlying AMI functionality becomes available and

system integrations are completed during the deployment process, subject to applicable regulatory requirements and approvals.

c. The Company intends to use AMI meters and their data to maximize the capabilities thar are available within this technology, which includes creating 8760 profiles. Please refer to the Company's responses to OCC-587[i] and OCC-745[ii] for more information regarding this topic.

Prior Referenced Responses:

[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

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 questions 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 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.

[ii] OCC-745 Question:

Refer to Exhibit CLP-AMI-2 at 8, "Figure 1 – Components of AMI Technology".

a. Please describe how the Company intends to leverage AMI to support distribution planning and operations including the following:
   i. Please describe whether the Company intends to leverage AMI to support the development of 8760 profiles at the substation, circuit and nodal level.
   ii. Please describe how the Company intends to use AMI to support real-time operations including the latency at which operational systems such as ADMS and DERMS will receive this data?

OCC-745 Response:

i. The Company intends to leverage AMI to substantially enhance its ongoing efforts to forecast demand at a granular, customer level. The Company has already begun developing customer-level technology adoption propensity models to project the penetration of EVs, heat pumps, and solar across its service territory. Presently, these efforts rely on third-party data and assumed load profiles in Connecticut, because the Company lacks observed data on adoption and usage for these customers. AMI would provide the Company with ground-truth data that is more reflective of the CL&P-specific customer base and service territory, thus meaningfully improving the accuracy of near-term forecasts and the Company's confidence in long-term forecasts.

   AMI would improve upon two specific limitations in the Company's current forecasting capability relevant to distribution planning.

   First, the Company is presently unable to determine, with a high degree of confidence, which individual customers have already adopted technologies such as EVs or heat pumps. Adoption is inferred through propensity modeling informed by third-party data sources rather than observed directly. AMI interval data would allow the Company to detect the load associated with these technologies at the individual meter, enabling adoption to be identified and validated against the Company's own aggregated system data. This present-day adoption would then be used to forecast future adoption with more accuracy than derived using present-day adoption data.

   Second, while the Company has SCADA telemetry, the Company currently has limited data on how these technologies affect granular load curves at a customer level once adopted. Generic or third-party-derived profiles may not accurately reflect the climate, housing types, customer types, rate structures, and adoption patterns specific to the Company's Connecticut service territory. AMI interval data would enable the Company to derive its own localized technology-specific load shapes directly from observed customer usage, vastly improving the accuracy of the inputs used to translate adoption forecasts into load forecasts. Put simply, the Company's ability to forecast the future development of its system is inherently constrained by its limited visibility into the present state of that system, and AMI would directly address that limitation.

   With regard to the development of 8760 profiles, please refer to the Company's response to OCC-575.

ii. Exhibit CLP-AMI-2 at 8, "Figure 1 – Components of AMI Technology" is intended to show AMI systems and their relationships. The arrows between the head end and meter data management systems and the ADMS and DERMS real time systems are intended to show potential future integrations that are not included in the Company's implementation plan. (Note that the integration with OMS is included in the implementation plan.)

As described in the response to OCC-747, "[t]he Company is currently investigating the technical feasibility, costs, and benefits of an AMI-informed DMS model, including the benefits for voltage optimization. Issues of data latency will be included in this investigation."