Date Filed: September 28, 2026

Witness: Jared A. Lawrence and Jennifer A. Schilling
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-AMI-2 at 38, "Once the VVO control system can accept AMI voltage data directly, the Company will develop an integration between the VVO control system and the MDMS, allowing the VVO system to respond to voltage violations (below or above stated thresholds) automatically."

a. Please describe the latency at which the Company's VVO control system will receive AMI data.
b. Please describe how VVO will be coordinated with the DERMS demonstration on centralized voltage management.

Response:

a. As noted in CLP-AMI-2 at 38, the integration between the VVO control system and MDMS has not yet been developed. Accordingly, the latency at which the Company's VVO system will receive AMI data has not yet been determined.

   The Company's VVO control system will be an application known as load voltage management ("LVM") within its distribution management system ("DMS"). The DMS is a real-time application, using real-time telemetry from substations and field devices to provide system operators with as-operated load flow tools. As AMI represents millions of data points, integration of real-time AMI telemetry into DMS/LVM is a technical challenge that will require significant design and testing.

   The Company expects the use of AMI data to support real-time VVO operations will occur in phases. As described in CLP-AMI-2 at 38, the first phase will be operational dashboards using recent (not real-time) AMI data to support assessments of VVO operations for the purpose of improving use of the DMS/LVM for voltage optimization. Second, AMI data will be used to improve the accuracy of load profiles used to inform DMS load allocation. This will increase the accuracy of the DMS load flow, which will improve the functionality of all DMS applications, including LVM. The third step would be the use of real-time AMI telemetry to inform the DMS model. The 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.

b. The opportunity to include VVO in the DERMS demonstration (in coordination with the Grid Services Compensation Fund) focuses on the use of DERMS to operate advanced inverters from customer DER, including solar and battery energy storage, via the DERMS to support reactive power management. The objective would be to assess the technical feasibility, costs, and benefits of incorporating customer DER in the Company's VVO operations, using the DMS/LVM tools described above, to test the hypothesis that use of existing DER to manage voltage will result in net cost savings for customers.