Date Filed: August 28, 2026

Witness: RUNYON, JENNIFER M
Request from: Public Utilities Regulatory Authority

Question:
Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, p. 59. Explain why the EDCs consistently call substantially fewer active dispatch events than the maximum number permitted under the Program. In the response, address why this practice is appropriate given the Program's reduced ability to rely on the "insurance policy" provided by passive dispatch.

Response:

As stated in CAE-11, the dispatch ranges represent both a minimum and a maximum number of event calls per season.

Event calling decision are based upon ISO New England's peak demand forecasts. Before the season begins, the Program Administrators ("PAs") carefully review the prior season's peak demand and weather forecasts to arrive at dispatch "thresholds" for each demand response asset class.

Once the season begins, the New England PAs meet daily in July and August to review the ISO New England forecast against the threshold for demand response events by asset class. The PAs will also meet in June and September if the ISO New England's peak demand forecast shows the potential of that day being the annual peak of the year. The decision to call demand response events occurs through a consensus-based process that is jointly managed by PAs across the New England states.

Pertaining to ESS batteries, if the peak demand forecast is above the threshold for battery dispatch, the Program Administrators then check the weather forecast and PA Emergency Response Plan ("ERP") activations. If no major storms or local storms are predicted in EDC specific territories, the PAs then look at the probability of when the peak will occur. A peak hour probability forecast informs the specific event hours and the decision to call a two- or three-hour event.