

Q.DPS.GMP.3-37. Please refer to page 12, lines 10-12 of Mr. Castonguay's rebuttal testimony:

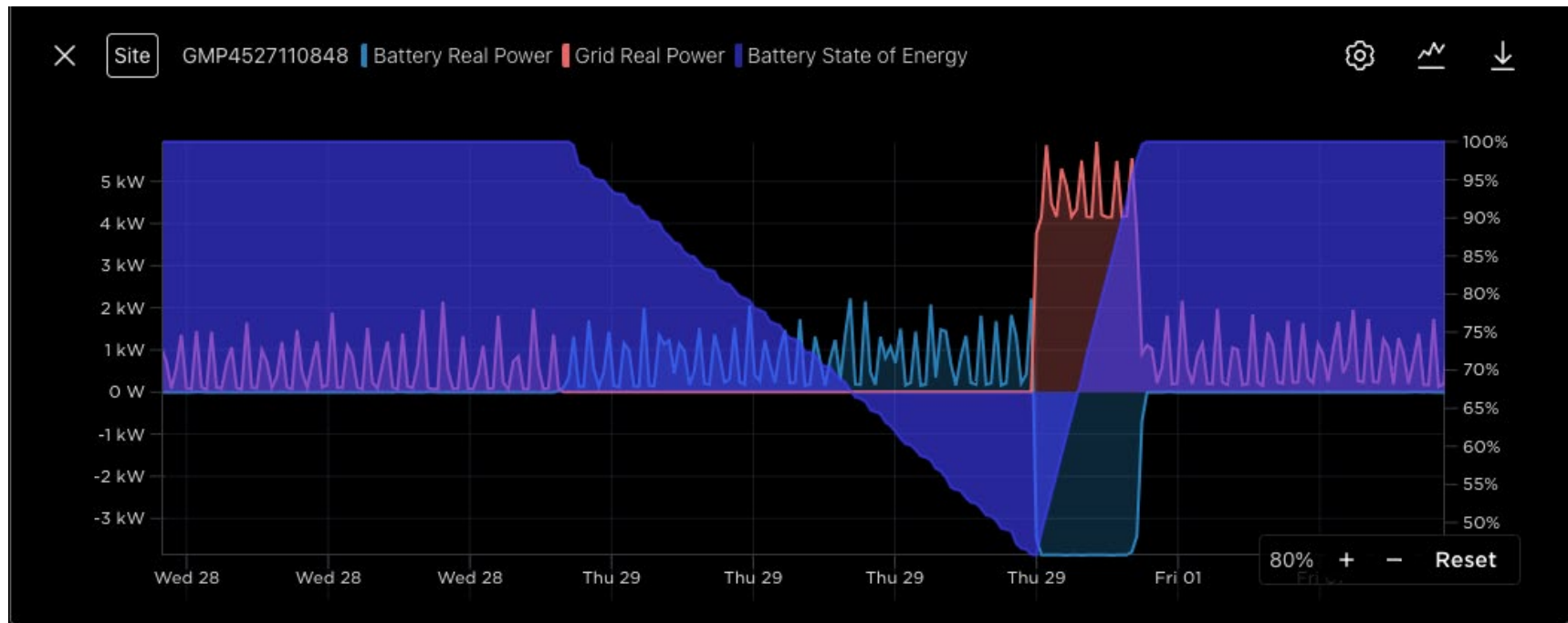
- a. Please provide data that demonstrates a seamless transition to the battery include actual recording information.**
- b. Please provide data demonstrating that the batteries provide whole house back (including all appliances) during all outages.**

A.DPS.GMP.3-37.

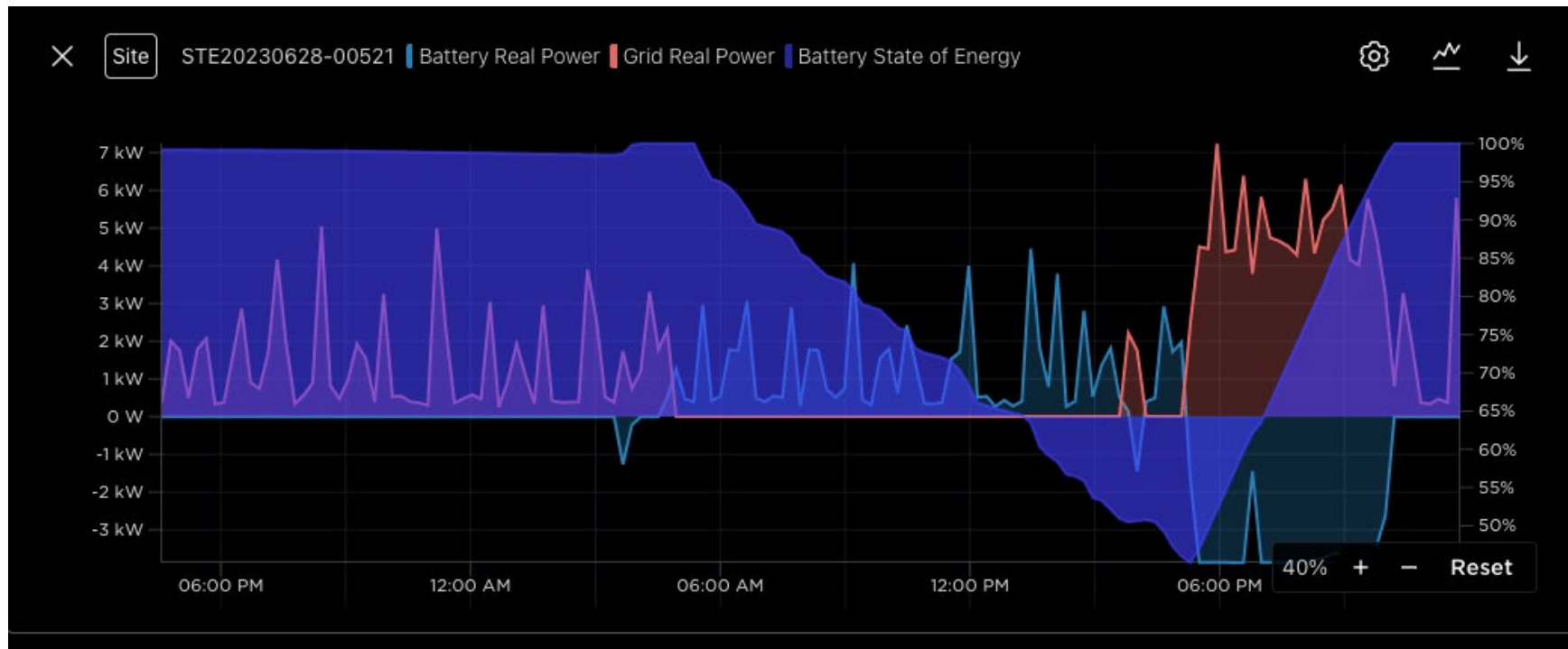
- a. As described by Tesla, the equipment functions "seamlessly," *see* <https://www.tesla.com/support/energy/powerwall/learn/how-powerwall-works> and that is backed up by our experience and the experience of customers even though the recorded data reported by Tesla's Powerhub is not at sub-second resolution. By seamless we mean that the customer does not notice a 'blink' like they typically would experience when using a generator and a transfer switch. The Powerwall with Contactor can transition from grid to island mode in a fraction of a second and typically the only way customers are aware that there is a grid outage in the area is due to the notification from GMP or the Tesla Powerwall App.
- b. **Objections 1, 7.** GMP objects to this request insofar as it misstates and exceeds the scope of Mr. Castonguay's testimony, which did not state that batteries will back up all appliances in all cases. Without waiving or otherwise limiting the objections, GMP responds as follows:

Whole-home backup is the standard installation practice, and we frequently hear from customers around storm events about the performance of their systems backing up all of the loads they need in their homes to ride out a grid outage. As an example, please refer to Attachments GMP.DPS3.Q37.1 and 37.2, which depict whole-home Powerwalls supporting two representative customers throughout lengthy outages at the level of consumption typical of non-grid outage use for these customers. Customers ultimately work with their installer to choose if their system will provide whole-home backup or have specific loads isolated from the Powerwalls (large loads that are not critical during an outage – a hot tub for example) and GMP does not track this.

Person/s Responsible for Response: Josh Castonguay
Title of Person/s: VP, Chief Innovation and Engineering Executive
Date: May 3, 2024



Attachment GMP.DPS3.Q37.1



Attachment GMP.DPS3.Q37.2