

INTERROGATORIES

Q:DPS:GMP.2-1: Question DPS.GMP.1-1 requested quantification of “the cost of each peak-shaving resource (\$/kW-month) on an average annual and long-term levelized basis.” GMP’s response describes “the range of peak shaving *value* for current energy storage service agreements (ESSAs)” (emphasis added) and of residential value. Please provide the cost of each peak shaving resource.

- a. More specifically, please provide the gross cost and the net cost (net of quantifiable value streams to ratepayers) for all GMP owned and contracted energy storage resources. Please provide in the same format as the gross levelized costs as described in Exhibit GMP-JC-3 and GMP’s response to DPS.GMP.1-2.**

Response: Using the word “value” instead of “cost” was a typographical error. The figures presented in \$/kW-month in response to Q:DPS:GMP.1-1 are the costs for the respective peak shaving resource, as requested in that question and above.

- a. Models previously provided for the residential programs show gross and net costs on a present value basis. See Exh. GMP-JC-3 (ZOI Storage Program); Attachment GMP.DPS.2-1a (current ESS Model, previously provided as Exh. GMP-MMC-1 in Case No. 25-0948-PET). For a summary of gross and net costs for GMP’s current energy storage service agreements (ESSAs), see Attachment GMP.DPS.2-1b. Models showing gross and net costs for GMP’s owned energy storage systems were provided in CPG proceedings related to each resource. See e.g., Case No. 17-5003-PET (GMP MicroGrid-Milton); Case No. 17-5236-PET (GMP MicroGrid-Ferrisburgh); Case No. 18-2902-PET (GMP Essex Solar/Storage); Case No. 17-2813-PET (Panton Battery); Case No. 22-4009-PET (Troy Battery).

Person(s) Responsible for Response: Josh Castonguay, VP, Chief Innovation Officer, Generation and Power Supply.

Q:DPS:GMP.2-2: Question DPS.GMP.1-5 requested estimation of the amount of major storm costs that will be avoided by Zone 4 tariff investments. GMP did not provide an estimate in response, instead referring to the Commission order in case No. 23-3501-PET discussing the need to develop more data. Please confirm that GMP has not made a quantitative estimate of the specific amount of storm costs that will be avoided by the proposed Zone 4 Tariff investments.

Response: Confirmed, for the reasons explained in response to Q:DPS.GMP.1-5. Specifically, these investments are forecasted as NPV positive for all customers such that any storm response savings would increase that value to customers. These investments are planned as part of the comprehensive work across zones that will be done on these four identified circuits, leading to savings from the collective effect of work across zones that will enable us to adjust our storm planning and response—which will be evaluated as circuits are completed consistent with the Commission's Order. In addition to the expected storm response savings, Zone 4 Energy Storage Systems will also provide improved customer and employee safety during storms, key goals which further increase the already positive value beyond what has been quantified. See also response to Q:DPS:GMP.1-5.

Person(s) Responsible for Response: Josh Castonguay, VP, Chief Innovation Officer, Generation and Power Supply.

Q:DPS:GMP.2-3: Question DPS.GMP.1-16 discusses formal least-cost alternatives analysis comparing Zone 4 Energy Storage Tariff to other solutions that could deliver equivalent reliability, resiliency, and grid benefits. GMP responded by citing its previously filed responses to the Commission's information request of May 6, 2025, specifically its response to PUC Info Request 5 and Attachment PUC-Info Request-5 (filed May 12, 2025, Case No. 25-0719-TF). This narrative compares the cost of energy storage to the cost of single-phase undergrounding with an example for four Zone 4 segments showing that: "(i)n total, undergrounding these four taps was estimated at \$960,500, compared to \$421,200 for the energy storage solution."

- a. **Do other infrastructure investments such as undergrounding provide identical benefits to customers as compared to installing an energy storage solution?**
- b. **If not, what are the differences – and were those differences considered in the analysis referenced above?**
- c. **In the event of an outage, will GMP still need to repair or replace storm-damaged infrastructure – including distribution lines – for Zone 4 energy customers? If so, should those costs be included in a comparison of solutions?**