

INTERROGATORIES

Q:DPS:GMP.1-1: Please provide a list of all GMP owned and contracted energy storage resources including but not limited to GMP's Energy Storage System Tariff, Energy Storage Services Agreements, and GMP-owned batteries.

- a. Please quantify the cost of each peak-shaving resource (\$/kW-month) on an average annual and long-term levelized basis.**

Response: Please refer to GMP's 2024 Proposed IRP, Tables 6-5 and 6-6 (excerpt attached as Attachment DPS.GMP.1-1a) and GMP's Annual Energy Storage Programs Report, Attachment 1, filed in Case No. 25A-0222 (attached as Attachment GMP.DPS.1-1b) for lists of all GMP owned and contracted storage resources.

For subparagraph a., as described generally in the Prefiled Direct Testimony of Josh Castonguay, pages 5-16, GMP's diverse portfolio of energy storage addresses and solves many grid and customer needs, with each resource offering a range of benefits. The range of peak shaving value for current energy storage service agreements (ESSAs) is \$6/kw-month to \$13.25/kw-month. Each contracted grid-scale resource has characteristics relevant to its specific ESSA. For example, the ESSA may allocate some use of the system to GMP while the developer retains other uses, or may provide full use. The size, duration (e.g. two-hour vs four-hour dispatch), and pricing (e.g. levelized vs. escalating) of the resources also differ by ESSA. The value of GMP residential programs is within that range; for example, the current ESS tariff provides just under \$11/kw-month using the latest model. Peak shaving and the other directly monetized benefits for customers described in testimony add to the resiliency and other benefits of these systems.

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

Q:DPS:GMP.1-2: Please provide a calculation of the proposed Zone 4 tariff's cost of peak shaving (\$/kW-month) on an average annual and long-term levelized basis from exhibit GMP-JC-3.

Response: Exh. GMP-JC-3 provides the gross levelized cost for the Zone 4 tariff which results in a range from \$12.72 - \$12.93 per kW-month for model Scenario A and B. This value is comparable to the range of other peak shaving resources

without accounting for any resiliency or other benefits and demonstrates why residential energy storage is the right solution for a resiliency program.

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

Q:DPS:GMP.1-3: Please quantify any monetary resilience or T&D deferral benefits GMP's Energy Storage System Tariff provides and the costs to achieve said benefits

a. How do these compare to the expected Zone 4 tariff costs and benefits?

Response: Please refer to the Prefiled Direct Testimony of Josh Castonguay in this proceeding at 26, 28-30, and to the Prefiled Direct Testimony of Madeline Murray-Clasen at 14 in Case No. 25-0948-PET. As discussed, and consistent with prior Energy Storage System (ESS) financial analyses, resiliency benefits have not been included or relied upon in the models. In both programs, the systems have positive financial benefits to all customers even before any additional beneficial value of resiliency. With respect to T&D deferral benefits, the ESS and Zone 4 Tariff programs each model the same average state-wide value derived from AESC 24 estimates as further explained in Prefiled Direct Testimony of Josh Castonguay in this proceeding at 27-28.

Person(s) Responsible for Response: Josh Castonguay, VP, Chief Innovation Officer, Generation and Power Supply; Jeremy Ravenelle, Distributed Energy Resources Leader

Q:DPS:GMP.1-4: In Case No. 23-3501-PET, witness Michael Burke states that it is very costly to restore service after significant storms and provides Exhibit GMP-MB-4 totaling GMP's Major Storm Spending from 2013-2023 to support GMP's investments in ZOI resilience measures.

a. What type of investments or cost containment efforts has GMP made to minimize restoration costs prior to pursuing ZOI measures?

Response: We have been working proactively to harden the grid, implement new technologies to support customer and community resilience, lower costs, enhance public and employee safety, and ensure continuity of our operations under

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.