

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

Q:DPS:GMP.1-20: In GMP's view, what constitutes the appropriate cost-effectiveness standard for evaluating the Zone 4 Storage Tariff under Vermont's least-cost planning statutes and related regulatory principles (e.g., 30 V.S.A. §§ 202a, 218c, 218d(a)(1), Commission Rule 4.400)?

- a. Please explain how the proposal meets that standard.
- b. If GMP believes a least-cost standard does not apply in this context, please explain why.

Response: **Objection 11.** This request calls for a legal conclusion. Notwithstanding this objection and without waiver, GMP responds as follows:

The intent of least-cost planning is to ensure we are incurring an amount of capital spending that is necessary for the provision of safe and reliable service. Deploying energy storage to these customers in Zone 4 meets this requirement as compared to the alternative T&D solution given the increasing frequency of major storm events and other risks on the modern grid. See Response to Q:DPS:GMP.1-16.

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Q:DPS:GMP.1-21: Has GMP used any least-cost planning framework, model, or tool from its Integrated Resource Plan (IRP) process to evaluate or prioritize the Zone 4 proposal?

- a. If not, please explain why not and whether GMP believes this project should be considered outside of IRP least-cost planning protocols.

Response: Please see responses to Q:DPS.GMP.1-16 and 1-20. When the full financial model of the storage is taken into account, these systems are a financial benefit to all customers. GMP's 2024 IRP describes our overall Zero Outages Initiative, including this Zone 4 energy storage component, that was subject to review in Case No. 23-3501-PET. See GMP's 2024 Proposed IRP at 3-8 to 3-12.