

Information Request EDC-3-7

Request:

Eversource and National Grid: Refer to the DOER's June 8, 2021 comment at 1-2. Explain what, if any, safeguards each company has considered in developing their Provisional Program proposals to ensure distribution customer benefits are maximized

Response:

DOER's June 8, 2021 comments at 2 encourage the Department to ensure that ratepayer benefits are maximized. As described in more detail in National Grid's Response to EDC-1 ("EDC-1 Response") at 8-9, in developing its Provisional Program proposal the Company considered how to maximize the benefits to electric distribution customers through multi-value investments. In determining how investments could benefit all electric distribution customers, National Grid considered the imperatives of the Commonwealth's clean energy and climate change policies, the concept of allocating costs to the beneficiaries of those multi-value investments and ideas such as shared capacity across load and generation customers and DG availability as a reliability requirement. As the Company explained, to date it has considered the potential benefits to all electric distribution customers from the contemplated system upgrades under a Provisional Program at a conceptual level and has identified the types of qualitative benefits that may result from the types of upgrades described in EDC-1 Response, subparagraphs a. through d. at 2 through 7. National Grid also has reached conceptual agreement with the signatories of the Joint Letter Supplemental Comments submitted on June 8, 2021 on the proposed multi-value infrastructure upgrades described therein that will benefit DG developers and also provide significant system and climate benefits to all electric distribution customers. The potential system upgrades National Grid identified in EDC-1 Response are consistent with DOER's objective. If the Department approves a Provisional Program, National Grid will focus on maximizing the multi-value benefits to all electric distribution customers from the specific system upgrades identified through the Provisional Program planning process, consistent with DOER's objective.

DOER's June 8, 2021 comments at 2 also encourage the Department to consider the cost impacts on customers. The Company provided illustrative bill impacts in its Response to EDC-2 and its Response to EDC-2-5 that assume the completion of the potential system upgrades under a Provisional Program described in EDC-1 Response that maintain bill impacts within the annual rate cap the Department proposed in its Straw Proposal, consistent with DOER's objective.