

Information Request DPU-Common-1-23

Request:

Refer to, e.g., D.P.U. 23-06, prefiled testimony of Ian Springsteel, Manuel Saadallah and Sheila Horowitz at 18. For each CIP in which the Company proposes curtailment of ESS, please explain:

- (a) How the Company in practice plans to secure Group Study agreement on and implement, monitor, and enforce curtailment of the ESS in the Group Study to ensure that the ESS do not exceed their maximum curtailed capacities;
- (b) If further capital or operating measures or investments relative to curtailment are necessary and whether their costs are included in each CIP; and
- (c) Whether ESS projects seeking interconnection after the Group Study would similarly be subjected to curtailment.

Response:

- (a) Each Group Study participant's agreement to curtailment will be documented in its Interconnection Service Agreement (ISA) and the Company will implement, monitor and enforce curtailment of ESS at each applicable site as described in, e.g., D.P.U. 23-12, Exh. AG 2-3.
- (b) All equipment and operating investments relative to curtailment are included in the site specific costs for sites with curtailments.
- (c) See, e.g., D.P.U. 23-12, Exh. AG 3-1 (b), for curtailment implications for future ESS projects seeking interconnection in the Group Study area.