

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Tariff filing of Green Mountain Power requesting a 5.45% increase in its base rates effective with bills rendered January 1, 2019, to be fully offset by bill credits through Sept. 30, 2019)))) Case No. 18-0974-TF

**LOCATION INDEX OF GMP RESPONSES TO COMMISSION INFORMATION
REQUESTS IN REBUTTAL TESTIMONY & EXHIBITS**

Req. #	Commission Information Request	Responsive Testimony	Responsive Question/Exhibit #
1	Please refer to Exhibits BO-1 and BO-3. How does GMP determine the level at which it will fund an innovative solution, particularly when the solution appears to have substantial net benefits?	Otley	Q7
2	Please provide the project folder for the ePark project described on page 13 of Josh Castonguay’s April 14, 2018, prefiled testimony. Did GMP consider undergrounding or rerouting the distribution line that currently serves the Emerald Lake State Park facilities?	Castonguay	Q18; Exhs. GMP-JC-4, GMP-JC-5
3	GMP has identified several new sources of electricity demand like heat pumps, storage batteries, and electric vehicles. Has GMP developed its own forecast of electricity demand resulting from adoption of these new technologies? Does GMP disagree with any portions of Itron’s forecast of new load resulting from these technologies?	Smith	Q37
4	What sensitivity analyses has GMP or Itron made of the assumptions in their projections of electricity growth/decline over the rate year and what factors went into those analyses? How have GMP’s or Itron’s previous forecasts of solar penetration compared with the actual rate of solar penetration? What lessons has GMP learned from that experience, and how are those lessons applied in the current proceeding?	Smith	Q38
5	Itron validated and calibrated its model for revenue calculations. Did it conduct similar validation and calibration for its model for penetration of new sources of electricity and expected energy efficiency? If so, what were those analyses? If not, why not?	Smith	Q39

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6	Please provide more detail about GMP's plans to use battery storage. GMP recently issued a press release announcing that GMP had avoided significant expenses by using battery storage projects to avoid ISO-NE charges during a summer peak. Provide an estimate of the annual savings GMP expects to obtain from its current fleet of battery storage facilities. Does GMP's forecast of power expenses reflect anticipated savings like those described in the press release? Do battery storage projects have the ability to address winter peaks? If they do, does GMP's forecast of power costs reflect these savings?	Castonguay	Q19; Q20; Q21
7	Please explain in more detail the type of controls and equipment the behind-the-meter ("BTM") platform is intended to manage and how that management will be used to both control use by the customer and, where appropriate, to send electricity from the customer into the system.	Castonguay	Q22
8	Please refer to exhibit JC-3. Please provide this table in Excel. Please explain the meaning of "A&G Absorbed that would flow into O&M." Please describe how this figure was calculated.	Castonguay	Q23; Exh. GMP-JC-3 (Rev.)
9	Exhibit JC-3 states that the innovative pilot programs will result in \$365,120 in net additional revenue to the Company. Please explain whether this figure was calculated using the revenue forecasts developed by Itron. If not, how was this figure calculated?	Castonguay	Q24
10	Mr. McNamara states that GMP includes its REC inventory balance in its rate base. Please describe in detail GMP's rate treatment of its REC inventory balance and why it is in rate base rather than accounted for as a power supply cost.	Ryan	Q14
11	Please refer to Mr. Dawson's prefiled testimony at page 27. Please respond to Mr. Dawson's testimony that "a forecast that more closely resembles the growth and expectation from recent capacity auctions and market forecasts is more conservative than an aggressive increase to Net CONE."	Smith	Q40
12	Please refer to Mr. Dawson's prefiled testimony at pages 40 through 41. Why did the analyses of the Powerwall program and the JV Solar/Battery projects not use the same capacity price forecasts and loss factors?	Smith	Q41

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13	Please refer to Mr. Mara's prefiled testimony at pages 17 through 18. Mr. Mara discusses the Brandon undergrounding project and the fact that the cost of the project has increased from an estimated \$203,176 to \$409,051. When GMP enters agreements with customers for undergrounding or for line extensions or other work, does GMP include in the agreement that the customer will be responsible for any costs that are above the estimated cost?	Fiske	Q31
14	Please refer to Mr. Mara's prefiled testimony at pages 17 through 18. Please identify any capital projects in this proceeding (in addition to the Brandon undergrounding project) where the cost of the project exceeded the estimate provided to the customer who was responsible for a portion of the project's costs. For each project, please state the difference between the estimated cost of the project and the actual cost of the project and identify who is responsible for paying the extra cost.	Fiske	Q32
15	Please address whether the J-V microgrid projects should be included in rates if the Commission has not yet ruled on all of GMP's petitions for certificates of public good prior to the resolution of this case. Please state what GMP's cost of service would be if these projects are not included in rates.	Shields	Q18