Comments/Questions on CCEBA responses:

The CTPC did not appear to respond to CCEBA's comment on prioritizing violations and identifying clusters of violations that can be solved.

CTPC Response

- The previous response addressed how the CTPC is adopting the proposed "top-down" approach for clustering projects. In addition, the Selection Criteria and scoring presented at the March TAG meeting is helping the CTPC prioritize individual violations to develop these clusters.

- "Backbone" projects – As a starting point, the CTPC plans to test a number of major greenfield projects with the goal of addressing overloads across an area. These solutions will be compared against addressing individual violations through a combination of smaller projects and alternative solutions.

- Additional details provided in "Summary and Responses to SELC, NCSEA, SACE, and Sierra Club comments."

- Needs Grouping – As a starting point, the CTPC plans to test a number of major greenfield projects with the goal of addressing overloads across an area. These solutions will be compared against addressing individual violations through a combination of smaller projects and alternative solutions. Early signs indicate that major projects, especially on the 500kV system, can have widespread impacts spreading over 100 miles so geographical proximity rules will not be an option

Regarding the note on pg. 1 that the CTPC will report congested lines as informational only, does the CTPC not intend to resolve economic congestion? If so, why not?

CTPC Response

- Economic congestion will be reflected in the benefits for MVST projects. However, transmission constraints that only show up in the nodal production cost model without other drivers could be due to modeling issues with neighbors and will not be included as MVST projects.

The CTPC should separately quantify the Avoided Customer Outages benefit as well the avoided cost of deferred asset renewal projects. Failure to do so understates benefits and appears to conflict with Order No. 1920's benefit metrics.

CTPC Response

- As in our last response, the Avoided Customer Outages benefit is based on the model used to identify high value aging infrastructure projects so if we take credit for the benefits of a project and the avoided cost of the same project, that would be double counting. The benefits of any MVST project that addresses an aging infrastructure need will be captured by the Customer Outages benefit. Transmission investments that appear in a CTPC Base Reliability plan will be eligible as an "Avoided Transmission Investment" if they are deferred or avoided by an MVST project.

The CTPC notes on pg. 3 that modifications or alternative datasets may be required for nodal analysis. Does the CTPC intend to make these modifications and/or develop these alternative datasets?

CTPC Response

- Yes, modifications to align the model with neighboring utilities will be made, as needed.

<u>Comments/Questions on SELC/NCSEA/SACE/Sierra Club responses:</u>

How does the CTPC define "major" projects, as used on pg. 4?

CTPC Response

- For MVST, there is no formal definition of a "major" project, but it may include (but is not limited to) projects like new transmission lines, voltage conversions, and transformers, especially if additional right-of-way is required.

Please provide clarity on the engineering judgment used to develop the proposed major greenfield projects on pg. 4.

CTPC Response

- Although many hypothetical solutions have been tested (i.e. greenfield transmission lines between many major buses), priority is given to solutions with existing right-of-way or available substation connections that would reduce costs and risks.

The CTPC's response to joint commenters' suggestion of a counterfactual case using piecemeal upgrades does not appear to address the benefits calculation of piecemeal upgrades. Comparing a no-network-upgrade reference case against the portfolio-of-upgrades change case will miss some asset renewal benefits that piecemeal upgrades would show.

CTPC Response

- For each identified solution cluster, the piecemeal upgrades will be considered as one of the solution options instead of as the reference case, which will not assume any transmission upgrades.

- In CCEBA's "Comments on CTPC March 2025 TAG Meeting on MVST Study", they described this methodology:
  "Alternatively, the CTPC could assume that the reference case includes generation resources built in the same locations as the MVST scenarios, but without any additional network upgrades beyond what is included in the 2024 CTPC Transmission Plan. This alternative approach to defining the reference case (Approach 2) would create a lot of congested generation since the transmission system would not have been built for the resources to be deliverable to load. Defining the reference case in this way will result in significant production cost savings due to the high curtailments of resources but lower avoided transmission costs (since limited transmission is built in the reference case)."

Regarding benefit metrics, although there is no requirement to track the Order No. 1920 benefits, if the CTPC intends to align the MVST process with SERTP's Long-Term Regional Transmission Planning in the future, aligning the benefit metrics now would greatly simplify that effort.

CTPC Response

- CTPC will not be able to align with regional planning in this cycle since SERTP has not fully developed their Order No. 1920 benefit methodology. Most Order No. 1920 compliance filings will not be available until 2026. We will continue to review developments in the regional planning process and look for opportunities to align in future MVST cycles.

With respect to the "Natural Gas Sensitivity" on pg. 6, please confirm that the CTPC intends to use both low and high natural gas prices, rather than a single sensitivity.

CTPC Response

- Yes, a low and high natural gas forecast sensitivity will be included with final portfolio benefits.