

1 PUB-CA-007 **On page 33, lines 9-11 Elenchus states: “The evidence to date indicates**
2 **to Elenchus that NP is excluding consideration in its 2022 CBA of**
3 **alternatives that merit at least preliminary inclusion in “a reasonable**
4 **range of alternative solutions”. Please reconcile this statement with the**
5 **response provided in CA-NP-114.**
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7 RESPONSE: The quoted sentence relates specifically to the capital projects that are
8 proposed as part of the 2022 CBA.
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10 Taking the broader view that is addressed in CA-NP-114, the Elenchus
11 Report stated on page 34, lines 1-3: “This response indicates that NP takes
12 a very limited view of the role of NWAs in the modern electricity grid. This
13 constrained view drives a preference for traditional, long-lived capital-
14 intensive alternatives for meeting the needs of customers.”
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16 The response references participation in “various industry groups and
17 committees to stay informed on NWA solutions”, evaluation of TOU rates
18 which could support some NWA initiatives, a DSM pilot project,
19 introduction of a limited net metering service option, and an evaluation of
20 “the use of utility scale storage as an alternative to defer the addition of
21 substation transformer capacity.”
22

23 None of the identified actions demonstrate that DER alternatives are
24 included by NP in order to ensure that it meets the prudence review
25 requirement that it identifies “a reasonable range of alternative solutions”.
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