

Q.DPS.GMP.1-5: On page 13 of his Prefiled Direct Testimony, Mr. Burke states that “[t]he resilience work we have accelerated through the ZOI and proposing to continue during this next [MYRP] period will, over time, help reduce outage response costs.” Has GMP performed an analysis to quantify the economic impact to ratepayers of a given amount of resilience investment on reducing outage response costs? If so, please provide that analysis. If not, please explain why not.

Objections 2, 5. The question is vague and ambiguous in that the phrase “economic impact” is not defined. GMP also objects to the extent the question calls for attorney-client or attorney and expert work product. Without otherwise waiving or limiting the objection, GMP responds as follows:

A.DPS.GMP.1-5:

GMP is in the process of conducting benefit cost analysis of resilience work to be proposed in the FY27 rate case, as one of the factors considered when selecting resilience projects. This analysis will include consideration of anticipated benefits for customers from avoided outages, including estimated avoided outage restoration costs associated with proposed work. See Responses to Q.DPS.GMP.1-3 and 1-7.

Person/s Responsible for Response: Mike Burke
Title of Person/s: VP, Operations
Date: November 21, 2025

Q.DPS.GMP.1-7: On page 19 of his Prefiled Direct Testimony, Mr. Burke states that “during the ZOI proceeding, we heard interest to see upfront annual planning that scopes the areas, types, and level of investment so that the Department and Commission have insight into the work we expect to accomplish. To address this, the [new MYRP] requires that GMP file a resilience scoping plan each year detailing the areas of upcoming work and level of investment, as set forth in Attachment 11a to the New Plan (Exh. GMP-LD-RB-1).” Please describe how the scoping plan will justify (e.g., through assessment of future hazards, analysis of system vulnerabilities, and performance of ex ante benefit-cost analysis) GMP’s proposed resilience investments, including providing a template for the proposed scoping plan.

A.DPS.GMP.1-7:

GMP’s initial MYRP proposal called for a not-to-exceed amount for resilience work each year, with an associated scoping plan, a template of which was provided as Attachment 11a to the Proposed Plan. Since filing the initial Proposed Plan in August, GMP completed its first full year of ZOI improvements, yielding additional information on project logistics, costs, and performance. Informed by this additional experience, we anticipate updating the resilience component of the Proposed Plan to include a total set amount of capital to support accelerated resilience over the course of the four-year plan period. This updated approach will target work on our least reliable circuits over that four-year period, guided by circuit specific information on existing system vulnerabilities, performance of proposed solutions, as well as consideration of the anticipated benefits of this work. Benefit cost analysis supporting specific proposed FY27 resilience investments will be filed with the FY27 rate case and will be one of the factors taken into account in selecting the work we do on each circuit. See Response to Q.DPS.GMP.1-5, above. Our plan will balance the resilience benefits of the identified upgrades with the capital cost of completing them by assessing the benefit-cost analysis as well as other criteria such as critical facilities, outage data, avoided costs, and safety considerations as well as those identified in Attachment 11 to the Proposed Plan (Exh. GMP-LD-RB-1).

Person/s Responsible for Response: Mike Burke, Carol Weston
Title of Person/s: VP, Operations; VP, Grid Resiliency and Implementation
Date: November 21, 2025