

Q.DPS.GMP.1-86: Please provide a BCA from the utility cost perspective. If such an analysis has not or cannot be conducted, please describe methodologically what changes Mr. Eiden believes would be necessary to review benefits and costs from a utility cost test perspective.

Objection 8. GMP objects to the question to the extent it requests additional study or analysis not yet conducted. Without waiving or otherwise limiting the objection, GMP responds as follows:

A.DPS.GMP.1-86:

As described in A.DPS.GMP.1-85, the BCA completed in Exhibit GMP-AE-2 is a Total Resource Cost (TRC) test perspective modified to reflect jurisdiction-specific considerations and leveraging national best practices specific to evaluating resilience investments. This is the most appropriate test perspective to represent the benefits to Vermonters of these projects, as further outlined in the Department's August 20th, 2025 Straw Proposal in Case No. 25-0339-PET: "All of the costs and benefits that we refer to above [with respect to a resilience CBA] belong within a Societal Test or Total Resource Test. Therefore, use of this CBA framework should result in the best electricity resilience decisions for Vermont as a whole, considering total costs and benefits that accrue to all parties." The benefit and cost assumptions in this analysis are tailored to this specific goal of advancing resilience decision-making bounded by reasonable time and data processing constraints. This includes decisions on the treatment of key variables and which elements to include and quantify based on that goal. The utility-system elements of this TRC therefore cannot be converted directly into a fullsome UCT analysis without revisiting the treatment of variables including the level of conservatism and costs/benefits that were qualified but not quantified, such as crew and customer safety benefits.

Person/s Responsible for Response: Andy Eiden
Title of Person/s: Senior Manager, Current Energy Group
Date: March 6, 2026