OCC is an Active Participant in PURA's Electric Distribution System Planning & Grid Modernization Proceeding

The Office of Consumer Counsel (OCC) has appreciated the opportunity to be an active participant in Docket No. 17-12-03, the Public Utilities Regulatory Authority's (PURA) comprehensive proceeding to consider how to best enhance the current electric distribution system in Connecticut, including the potential for cost-effective modernization. On November 30, 2018, OCC filed its Brief laying out its positions derived from the docket evidence relating to electric distribution system planning and grid modernization.

In its Brief, OCC stressed the importance of consumer education and outreach under a modernized electric grid paradigm, in which more consumers are expected to become proactive in how they obtain and use energy. In addition, OCC underscored how there must be robust discussion about how to engage those consumers who may not have the means to meaningfully participate in aspects of a modernized grid: low-income consumers, rural consumers, consumers for whom English is a second language, senior citizens, renters, and those Connecticut residents who do not own a smart phone and/or have limited to no Internet access.

OCC's Brief also highlighted that electric distribution system planning is essential for development of an efficient electric distribution system. Specifically, OCC posited that in addition to the customary short-range planning of up to 5 years, Connecticut's two electric utilities should also incorporate long-range planning up to 15 years. Long-range planning would aid in optimizing the replacement of significantly aging infrastructure and ensure that short-term

planning decisions do not result in early obsolescence or excessive overbuilding. In addition, OCC recommended that a consistently applied Non-Wires Alternative ("NWA") process be implemented by the electric utilities as a part of distribution system planning. There is currently limited incentive for the electric utilities to aggressively consider a NWA. NWA analysis remains essential and should include a transparent process for all stakeholders.

Finally, in its Brief, OCC recommended that the electric utilities leverage conventional technology to implement Volt/Var Optimization ("VVO") and accrue system benefits while each utility develops a grid modernization strategy that may include enhanced VVO in the future. VVO is a combination of conservation voltage control ("CVR") and power factor ("VAR") optimization. CVR is conventional technology widely used by electric utilities to reduce system voltage during peak demand periods and often expanded to all other hours. The primary benefits include reduced power supply requirements, which in turn translates into lower generation needs and reduced demand on the distribution system. A lower demand reduces line losses and releases capacity on feeders and equipment, potentially deferring the need for capital improvements. Traditional voltage reduction can provide benefits during the transition period to a modernized grid. In this way, the electric utilities can accrue system benefits while completing a comprehensive grid modernization roadmap that may ultimately include enhanced VVO, involving two-way communications.

OCC commends PURA for administering this very important proceeding, and looks forward to active participation on behalf of Connecticut's electric ratepayers as the docket progresses. PURA is expected to issue a Proposed Final Decision in early 2019, after which participants may file written exceptions and provide oral argument.

Please visit OCC's website.