and Ronald D. Willoughby Attachment JED/RDW-7

Joint Direct Testimony of Jay E. Dudley

Public Service Company of New Hampshire d/b/a Eversource Energy Docket No. DE 20-161

Date Request Received: April 15, 2022 Data Request No. DOE 5-004 Date of Response: April 27, 2022 Page 1 of 2

Request from: Department of Energy

Witness: Labrecque, Richard C

Request:

Refer to April 1, 2022 Technical Session, (discussion --as remembered-- among Eversource employee Russel Johnson and the RCG Consultants about planning criteria and potential criteria violations)

- a. Please define the following terms with respect to system solutions when resolving system planning criteria violations:
 - i. Alternative Solution
 - ii. Feasible Alternative Solution
 - iii. Technically Feasible Alternative Solution
 - iv. Least Cost Alternative Solution
 - v. Best Overall Alternative Solution
- b. Please identify authoritative sources (internal to Eversource or otherwise) where the definitions provided above may be found.

Response:

Eversource has not formally documented definitions for the requested terms. Our general understanding of each term is given below.

Alternative Solution – project initiators are instructed to consider all reasonable solutions that address the needs identified. The initiator will gather input from a team of individuals from numerous Eversource functional areas. Each alternative solution is discussed from a variety of perspectives, e.g., electrical performance, constructability, outage planning, siting and permitting, environmental impacts, community and external stakeholder impacts, procurement, property rights, and future system expandability.

Feasible Alternative Solution – a project is considered feasible if no constraints have been identified that would preclude construction or implementation.

Technically Feasible Alternative Solution - a project is considered technically feasible if no technical constraints have been identified that would preclude construction or implementation.