

14-035-114/OCS  
September 28, 2015  
OCS Data Request 1.1 to DPU

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**RE: Docket No. 14-035-114  
OCS 1<sup>st</sup> Set of Data Requests to DPU**

1.1 Please refer to Mr. Davis' testimony lines 29-30, and clarify what Mr. Davis meant by "more realistic non-hypothetical inputs". Also, please identify the specific inputs that Mr. Davis found were not realistic.

### **Response to OCS Data Request 1.1 to DPU**

I stated in my rebuttal testimony that Mr. Hayet's proposal would result in a reasonable way to evaluate costs and benefits given more realistic non-hypothetical inputs. That was a mischaracterization. Rather than stating what I was trying to convey in that way, I should have clarified that I agree with Mr. Hayet's framework as arriving at similar conclusions to those of the Division and Company's framework proposals given current metrics. I should have commented on Mr. Hayet's illustrative examples as the reason why distributed generation can lead to problems such as those in Hawaii, California and Arizona if left unchecked. However, my statement about using more realistic non-hypothetical inputs to analyze present value levelized costs and benefits would have been better served if I would have stated that given current metrics, Mr. Hayet would reach similar conclusions to that of the Division and Company.