Attachment 2: Examples of Interrogatories Propounded by ALLCO that are Outside the Scope of this Proceeding (Other than Dispute Related Interrogatories)

Interrogatory	Notes on Relevance
ALLCO-035: For each year 2019 through 2025 and year-to-date 2026, state: (a) the quantity (MWh) of energy and other products the Company purchased under the Millstone PPA; (b) the average price per MWh paid; (c) the manner of disposition of those products (e.g., resale into the ISO-New England day-ahead or real-time markets, bilateral sales, or use to serve the Company's standard service or supplier of last resort service load), with quantities for each; (d) the revenues realized from each manner of disposition; and (e) the resulting net cost or net revenue charged or credited to customers through the NBFMCC (or any other rate mechanism), by year. Produce the supporting workpapers in native format.	The question seeks information regarding the Company's historical purchases of energy and other projects under the Millstone PPA and the manner of disposition of these products and revenues realized from such disposition. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-036: State whether the Company has at any time since 2019 analyzed, evaluated, or considered using the energy purchased under the Millstone PPA to serve its standard service and/or supplier of last resort service load, in whole or in part, rather than reselling that energy into the ISO-New England markets; produce every such analysis, evaluation, memorandum, presentation, or communication; identify, by title, each person who participated in the decision regarding the manner of resale; and state each reason for the disposition method chosen. If no such analysis exists, so state.	The question seeks information regarding the Company's historical evaluation of energy procurement and resale strategies under the Millstone PPA, including internal deliberations and the rationale for the disposition of energy in the ISO-NE market. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-037: In its September 18, 2019 Interim Decision in Docket No. 18-05-04, the Authority stated that "the manner in which these Products are resold can impact the value of the Agreements to ratepayers" and directed the EDCs "to thoughtfully consider their options in this area and to pursue those options that maximize such value." Describe each action the Company has taken in response to that directive from 2019 to the present; state whether the Company has ever changed its method of reselling Millstone PPA products; and state whether the disposition of Millstone PPA products is addressed in the Company's current procurement plan or any pending or planned procurement-plan update.	The question seeks information regarding actions taken in response to a 2019 PURA directive about the manner of disposition of Millstone PPA products. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-038: For each year 2019 through 2025: state (a) the Company's total standard service and supplier of last resort service load (MWh) and the average all-in supply cost per kWh the Company paid to wholesale suppliers for that load; (b) the average cost per kWh of energy purchased under the Millstone PPA; and (c) the net amount charged to customers through the NBFMCC in respect of the Millstone PPA for that year; and produce data sufficient to calculate, for each such year, the net impact on customers had the Company used Millstone PPA energy to serve standard service and supplier of last resort service load up to the lesser of the Millstone PPA quantities or that load (accounting for the residual quantities that would still have been resold into the market), including hourly standard service load data and hourly Millstone PPA delivery quantities in native format.	The question seeks historical information on the average costs of energy under the Millstone PPA and the amount charges to customers through the NBFMCC. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-039: State, as of the end of each year 2020 through 2025 and as of the most recent date available, the number and aggregate nameplate capacity (MW) of generating resources under five megawatts interconnected to the Company's Connecticut distribution system, separately for: (a) residential net-metered facilities; (b) non-residential net-metered and virtually net-metered facilities; (c) facilities under the Residential Renewable Energy Solutions and Non-Residential Renewable Energy Solutions tariffs; (d) LREC/ZREC facilities; (e) SCEF facilities; and (f) qualifying facilities with power purchase agreements; and, for each category, state whether the facilities (or their output) are registered with ISO-New England as generation assets or settlement only resources, or are instead unregistered and treated as load reducers.	The question seeks historical information on the number and aggregate capacity of various generating facilities under five megawatts interconnected to the Company's distribution system. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-040: Describe the Company's policy, practice, and decision-making process for determining whether a distribution-connected resource under five megawatts is registered in the ISO-New England markets or treated as an unregistered load reducer, including who (by title) makes that determination, the criteria applied, any ISO-New England or NEPOOL rules the Company contends require registration, and every analysis the Company has performed of the customer-cost consequences of registering versus not registering such resources. Produce all such analyses.	The question seeks information regarding the Company's policies and decision-making regarding the participation of distribution-connected resources in the ISO-NE markets, including market registration requirements and the treatment of such resources as load reducers. These matters concern wholesale market rules, market participation, and operational practices rather than the Company's proposed rates.
ALLCO-041: For each year 2020 through 2025, state the extent to which the output of distribution-connected resources under five megawatts reduced (or, if registered, did not reduce) the loads and billing determinants for which the Company's customers bear costs, including: (a) the Company's reported real-time load obligation in ISO-New England; (b) the monthly coincident peaks used to determine Regional Network Service, Local Network Service, and Transmission Adjustment Charge amounts (the "12-CP" determinants); (c) the Company's capacity load obligation and installed capacity requirement; and (d) reserve and ancillary charges; and quantify, in dollars per year, the reduction in each such cost category attributable to such resources, or produce the data sufficient to make that calculation. If the Company contends such resources produce no such reductions, explain why.	The question seeks historical information on the extent to which the output of resource under five megawatts reduced loads and billing determinants. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-042: Quantify the additional annual savings, by cost category (standard service procurement quantities, RNS, LNS, TAC, capacity, and reserves), that customers would realize (or would have realized in each year 2020 through 2025) if all eligible resources under five megawatts were treated as unregistered load reducers rather than registered in ISO-New England, and produce every study, analysis, or estimate the Company has made of that question. If the Company has never analyzed it, so state.	The question seeks the quantification of savings that customers would realize if eligible resources were treated as unregistered load reducers. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-043: Describe how amounts associated with net metering and virtual net metering are calculated and recovered from other customers through the NBFMCC (including the "avoided bill" methodology described by Company witnesses in Docket No. 20-01-01), and state whether the amounts so charged to customers are reduced or offset by the corresponding reductions in regional transmission charges (RNS, LNS, TAC), capacity obligations, and standard service procurement quantities attributable to the same behind-the-meter generation; if no such offset is made, explain why not, and quantify the annual amount charged to customers through the NBFMCC for net metering for each year 2020 through 2025 without any such offset.	The question seeks information about how net metering and virtual net metering amounts are calculated and recovered through the NBFMCC. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-080: (Follow-up to ALLCO-035.) The referenced annual RAM filings do not contain the requested year-by-year presentation. Provide, in a single native-format table for each calendar year 2019 through 2025 and year-to-date 2026: (a) the MWh of energy and quantities of other products purchased under the Millstone PPA; (b) the average price per MWh paid; (c) the disposition of those products by category and quantity; (d) the revenues realized from each disposition category, including the Company's buyer's percentage entitlement of ISO-NE settlement proceeds and CES-E sales proceeds; and (e) the resulting net cost or net revenue charged or credited to customers through the NBFMCC, by year. If any component appears in an existing filing, cite the docket, filing, exhibit, and page where the specific annual figure appears.	The question seeks information regarding the Company's historical purchases of energy and other projects under the Millstone PPA and the manner of disposition of these products and revenues realized from such disposition. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-081: (Follow-up to ALLCO-036.) The response identified two dockets but did not answer the question. State, yes or no, whether the Company has at any time since 2019 analyzed, evaluated, or considered using the energy purchased under the Millstone PPA to serve its standard service or supplier of last resort load in whole or in part; if yes, identify and produce each analysis, evaluation, memorandum, presentation, or communication, and identify by title each person who participated in the decision regarding disposition; if the presentations in Docket Nos. 17-12 03RE10 and 12-06-02RE04 are the only responsive materials, produce them in this docket and confirm that no analysis has been performed since.	The question seeks information regarding the Company's historical evaluation of energy procurement and resale strategies under the Millstone PPA, including internal deliberations and the rationale for the disposition of energy in the ISO-NE market. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-082: (Follow-up to ALLCO-037.) The response described the current arrangement but not the actions the interrogatory asked about. Describe each action the Company has taken from 2019 to the present in response to the Authority's September 18, 2019 directive in Docket No. 18-05-04 to "thoughtfully consider their options in this area and to pursue those options that maximize such value"; state whether the Company has ever changed the manner of disposition of Millstone PPA products, and if not, whether any change was ever evaluated; and state whether the disposition of Millstone PPA products is addressed in the Company's current procurement plan or any pending or planned update, identifying the relevant section or stating that it is not addressed.	The question seeks information regarding actions taken in response to a 2019 PURA directive about the manner of disposition of Millstone PPA products. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-083: (Follow-up to ALLCO-043.) The response described the calculation of net metering amounts but did not answer subparts (b) and (c). State, yes or no, whether the amounts charged to customers through the NBFMCC for net metering and virtual net metering are reduced or offset by the corresponding reductions in regional transmission charges (RNS, LNS, TAC), capacity obligations, and standard service procurement quantities attributable to the same behind the-meter generation; if no such offset is made, explain why not; and state the annual amount charged to customers through the NBFMCC for net metering and virtual net metering for each calendar year 2020 through 2025, in native format.	The question seeks information about how net metering and virtual net metering amounts are calculated and recovered through the NBFMCC. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-086: (Follow-up to ALLCO-038.) A referral to a public webpage and seven annual dockets is not an answer, and the remaining components are not public. Provide, in a single native format table for each calendar year 2019 through 2025: (a) the Company's standard service and supplier of last resort load in MWh and the average all-in supply cost per kWh paid to wholesale suppliers for that load (the figures the Company's referral sources contain, compiled); (b) the MWh of the Company's Buyer's Percentage Entitlement of Millstone PPA products actually delivered or settled, by month; (c) the effective all-in price per MWh actually paid under the Millstone PPA, identifying any component other than the $49.99/MWh contract price; and (d) the net amount charged or credited to customers through the NBFMCC in respect of the Millstone PPA, by year. Produce the hourly (or most granular available) Millstone delivery quantities and standard service load data in native format.	The question seeks historical information on the average costs of energy under the Millstone PPA and the amount charges to customers through the NBFMCC. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-087: (Follow-up to ALLCO-040.) The response omitted the decision-making the interrogatory asked about. Identify, by title, each person or group who determines whether a distribution-connected resource under five megawatts is registered in ISO-New England or treated as an unregistered load reducer, and state the criteria applied; identify and produce every analysis, evaluation, or quantification the Company has performed of the customer-cost consequences of registering versus not registering such resources — including any analysis underlying the position PURA approved in Docket No. 20-07-01 and any quantification of the "benefits for customers" the response describes — or state that no such analysis exists; and identify each exception to the Company's "general practice," i.e., each distribution-connected resource under five megawatts that is or has been registered in the ISO-New England markets since 2020, stating its size, program, and the reason for registration.	The question seeks information regarding the Company's policies and decision-making regarding the participation of distribution-connected resources in the ISO-NE markets, including market registration requirements and the treatment of such resources as load reducers. These matters concern wholesale market rules, market participation, and operational practices rather than the Company's proposed rates.

Interrogatory	Notes on Relevance
ALLCO-088: (Follow-up to ALLCO-041.) The components below require no counterfactual and are in the Company's possession. Provide, for each calendar year 2020 through 2025, in native format: (a) the Company's reported Real-Time Load Obligation, by month; (b) the Company's monthly coincident-peak (12-CP) values used for RNS, LNS, and TAC billing; (c) the Company's capacity load obligation and installed capacity requirement values; (d) the estimated or metered aggregate output of distribution-connected resources under five megawatts at each monthly system peak hour — including any behind-the-meter generation estimates or profiles the Company or its affiliates use in load forecasting, standard service procurement, or ISO-NE load reporting (including any ISO-NE behind-the-meter photovoltaic estimates the Company relies on); and (e) each document in which the Company or any affiliate has estimated the effect of behind-the-meter or load-reducing generation on peaks, load obligations, or transmission billing determinants. If the Company contends it possesses no data responsive to subpart (d), state whether output at peak could be derived from its PowerClerk records, production meters, or forecasting models, and why it has not done so.	The question seeks historical information on the extent to which the output of resource under five megawatts reduced loads and billing determinants. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-089: (Follow-up to ALLCO-042.) Identify each resource constituting an exception to "substantially all" — that is, each eligible resource under five megawatts that was registered in ISO-New England rather than treated as an unregistered load reducer at any time during 2020 through 2025 — stating for each its nameplate capacity, program or contract, the period of registration, and the reason; and state whether the Company has ever evaluated, or been requested by any customer, developer, or agency to evaluate, changing the registration status of any category of such resources, identifying each evaluation or request and its disposition.	The question seeks the quantification of savings that customers would realize if eligible resources were treated as unregistered load reducers. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-095: The Company's responses to ALLCO-040 and ALLCO-041 state that treating distribution-connected resources under five megawatts as unregistered load reducers "produces benefits for customers by reducing wholesale load obligations" and "reduce[s] the load and capacity supply obligations of all load serving entities." For each calendar year 2020 through 2025: (a) describe how the Company's retail load settlement process allocates the output of a host customer's behind-the-meter generation to the load-serving entity serving that customer — i.e., confirm that when the host customer is served by a licensed third-party supplier, the resulting reduction in settled load accrues to that supplier's wholesale position rather than to the Company's standard service load; (b) state the number of net-metered, virtually net-metered, and other load reducer host customers served by third-party suppliers versus taking standard service or supplier of-last-resort service, by year, and the associated behind-the-meter output in MWh for each group (or the best available estimate, identifying the estimation method); and (c) state the aggregate MWh by which load-reducer output reduced the settled Real-Time Load Obligation of the Company and of third-party suppliers, respectively, by year, in native format.	The question seeks information on the Company's retail load settlement process and other information related to load reducers. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-096: Quantify, or produce the data sufficient to quantify, the wholesale cost reductions realized by licensed third-party suppliers by reason of load-reducer treatment for each calendar year 2020 through 2025, stated separately for: (a) energy — the reduction in suppliers' settled load valued at applicable locational marginal prices; (b) capacity — the reduction in suppliers' capacity load obligations valued at applicable capacity prices; (c) regional transmission — the reduction in the coincident-peak determinants underlying RNS, LNS, and TAC charges attributable to load served by suppliers; and (d) reserves and ancillary services; and state, for each category, whether any statute, regulation, tariff, or contractual mechanism requires third-party suppliers to pass those savings through to their retail customers or to compensate the host customers whose generation produced them. If no such mechanism exists, so state.	The question asks the Company to quantify alleged wholesale cost reductions realized by licensed third-party suppliers by reason of load reducer treatment. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-097: State whether the Company has ever analyzed, tracked, estimated, or reported — internally, to ISO-New England, to the Authority, or otherwise — the division of load-reducer benefits between (a) the Company's standard service and supplier-of-last-resort customers and (b) third-party suppliers and their customers; identify and produce each such analysis or report; and state whether the Company has taken any action to measure, capture, credit, or claim — for its standard service customers, for the host customers whose generation produces the savings, or for ratepayers generally — the value that accrues to third-party suppliers from load-reducer treatment, and if it has taken no such action, state each reason why not.	The question seeks information related to the division of load-reducer benefits between standard service and supplier-of-last-resort customers and third-party suppliers and their customers. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.
ALLCO-098: With respect to the interaction of net metering costs and load-reducer benefits: (a) confirm that the NBFMCC is a non-bypassable charge assessed on all of the Company's distribution customers, including customers served by third-party suppliers; (b) confirm that, accordingly, the net metering and virtual net metering amounts included in the NBFMCC (described in the Company's response to ALLCO-043) are recovered from all distribution customers, while the wholesale energy, capacity, transmission, and reserve savings produced by the same behind-the-meter generation accrue to each host customer's load-serving entity — including third-party suppliers with no obligation to pass them through; (c) identify any analysis the Company has performed of this cost-benefit asymmetry, and produce it; and (d) state whether the Company has ever proposed to the Authority or to ISO-New England any mechanism to credit load-reducer savings against the NBFMCC or otherwise to align the parties who bear net metering costs with the parties who receive the corresponding wholesale savings, identifying each proposal or confirming there has been none.	The question seeks information on the interaction of net metering costs and load reducer benefits. The question fails to establish any reasonable nexus to any specific issue presented for PURA's determination in this proceeding.

Interrogatory	Notes on Relevance
ALLCO-126: (Windham Solar Facilities — estimate, collection, actual cost, and reconciliation.) With respect to the interconnection of the Windham Solar Facilities: (a) state the Company's estimate of Upgrade costs as set out in Appendix G of the Interconnection Agreements as executed in May 2016 and as revised by each subsequent amendment, and the date of each; (b) state each amount the Company collected from Windham Solar LLC for interconnection costs, the date collected, and the account in which it was recorded; (c) state the actual cost recorded in the Company's books for the Upgrades and interconnection facilities constructed for the Windham Solar Facilities, by work order and cost element, including any overhead or CIAC loaders applied, and produce the work-order cost detail in native format; (d) state each amount refunded or credited to Windham Solar LLC, the date, and the basis; (e) state whether the Company performed a final accounting or reconciliation of actual to estimated costs for that interconnection, and if so its date and result, and if not, why not; and (f) state the amount, if any, by which amounts collected exceeded the actual cost recorded in (c), and the current disposition of any such excess.	This request concerns charges and equipment associated with specific ALLCO projects and bears no reasonable nexus to any issue before PURA in this proceeding. ALLCO's intervenor status does not permit it to litigate every dispute it may have with the Company.
ALLCO-127: (Windham Solar Facilities — transfer-trip and substation components; post-2017 charges.) (a) State the estimated and the actual cost of the transfer-trip scheme and of the substation work included in the Upgrade estimate for the Windham Solar Facilities, identify the technology installed (power-line carrier, fiber optic, or other), and state who bore the cost of each. (b) Identify every charge billed to or withheld from Windham Solar LLC in connection with the Lebanon interconnection since September 1, 2017, including any operations and maintenance, ongoing, study, metering, or upgrade charge, stating the amount, date, and basis of each, or state that there have been none.	This request concerns charges and equipment associated with specific ALLCO projects and bears no reasonable nexus to any issue before PURA in this proceeding. ALLCO's intervenor status does not permit it to litigate every dispute it may have with the Company.

Interrogatory	Notes on Relevance
ALLCO-128: (Abington Solar Projects — line-extension estimate and CIAC.) With respect to the system impact study and cost estimate the Company provided for the Abington Solar Projects in or about 2017: (a) state the estimated cost of converting approximately 2.1 miles of single-phase 4.8 kV line to three-phase, the unit cost per mile on which it was based, and the source of that unit cost; (b) state the amount of the estimate designated as CIAC, the percentage applied, and the tax or other rationale for it, and identify the Company policy or tariff provision under which CIAC was assessed; (c) state whether the Company obtained or considered any third-party contractor pricing for the work, and if so identify it; (d) state the Company's actual average cost per mile for single-phase-to-three-phase line conversions completed in each year 2017 through 2025, and produce the supporting work-order data in native format; and (e) state whether the Company's current interconnection cost estimates for line conversions are derived from actual historical unit costs, and if so identify the unit-cost tables used.	This request concerns charges and equipment associated with specific projects and bears no reasonable nexus to any issue before PURA in this proceeding. ALLCO's intervenor status does not permit it to litigate every dispute it may have with the Company.