Date Filed: August 14, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Education, Outreach, and Enforcement

Question:

(ACCOUNT ESTABLISHMENT PROCESS-TELEPHONE) Describe the procedures and requirements for establishing a customer account via telephone, including all information required from the customer and any verification steps performed by Company representatives.

Response:

When customers opt to start service through the Contact Center, the customer must provide their full name, date of birth, and a valid form of identification. When a customer provides their Social Security number ("SSN") for identification purposes, the CSR attempts to verify the SSN matches to the customer's name through Experian, which is built into the customer information platform. Using a customer's SSN is the most efficient method to authenticate the SSN matches the customer's name. When the SSN cannot be verified to the customer, an additional step is taken to validate the information through Lexis Nexis.

When the SSN cannot be validated on either platform, the customer is required to submit two forms of identification ("ID"), one being a valid photo ID. Additionally, if a customer chooses an alternative method of identity verification, as detailed in the Company's response to EOE-068[i], they will be required to submit documentation (such as a driver's license), typically through the Secure Document Upload portal on Eversource.com.

When an existing customer of record or a customer that previously had active service with us calls to establish service at new location, the CSR attempts to verify the ID on file matches the customer's name. If the ID does not match, the customer will be required to submit documentation typically through the Secure Document Upload portal on Eversource.com. Additionally, the CSR places a Red Flag alert on the customers' profile indicating identification did not verify.

CL&P reserves the right to refuse service to an applicant who is indebted to the Company for any service previously furnished with the exceptions noted below:

1. CL&P does not refuse service to a customer with a verified serious illness protection during the winter moratorium months (November 1 through May 1) or year-round with a verified life-threatening medical protection.

2. CL&P allows customers to make a payment plan on their past due balance accrued at a prior address at the time of establishing service at a new address.

Prior Referenced Response:

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[i] EOE-068 Question:
(IDENTITY VERIFICATION STANDARDS) Describe in detail the Company's identity verification requirements for establishing a residential electric account, including but not limited to: (a) whether a Social Security number is required; (b) what alternative forms of identification are accepted; and (c) the documentation or validation standards applied to each form of identification.

EOE-068 Response:

a. A Social Security Number ("SSN") is *not* required to start residential electric service with Eversource. However, it's the most efficient way for the Company to authenticate a customer's identity. Customers may start service with Eversource by either opening an online account at Eversource.com or by calling the contact center. In both cases, customers are presented with an option to start service using their SSN *or* an alternative form of identification.

b. Acceptable identification options to start residential electric service are as follows:

   1. Social Security Number
   2. United States Driver's License Number (including Temporary Licenses)
   3. Current Passport - Issued by the United States or a Foreign Government
   4. State Identification Cards / Non-Drive Photo ID
   5. Other forms of Government-issued ID
   6. Consular Card
   7. Long Form Birth Certificate (with photo ID)
   8. Permanent Resident Cards
   9. Military ID (front and back of the card)
   10. Employment Authorization Card
   11. Puerto Rico License/ID
   12. ID used by federal, state or municipal government, including Refugee paperwork and/or a work, tourist, or student Visa.
   13. Letter from the Bureau of Population, Refugees, and Migration ("PRM") or the State Department that includes a picture of the applicant.

   If a customer chooses an alternative method of identity verification than SSN, they will be required to submit a copy of the documentation to the Company, typically through secure document upload portal on Eversource.com.

c. When a customer provides their SSN for identification purposes when establishing service, CSRs attempt to match their SSN to the customers' name using Experian. This verification process is built directly into the customer information platform. If the SSN cannot be verified to the customer, an additional step is taken to validate the information through a separate system called Lexis Nexis. When the SSN is unable to be matched

on either platform, the customer is required to submit two forms of identification, one being a valid photo identification, via Eversource's secure document upload at Eversource.com.

Once the customer's identification documentation has been received and verified and the account established, the CSR documents the type of identification the customer provided to establish service. Additionally, for a select few of the available identification methods, the system retains the identification number in a secure manner. To protect customer privacy and reduce the risk of unauthorized disclosure, the system masks and encrypts the majority of the identification number.

Customers moving to and from service locations within the Company's Connecticut service territory do not need to provide the identity verification information that brand new customers do when they *first* establish service and open an account.

In addition to the above information about the information required to verify a customer's identity, the Company also notes that use of SSN (in part) is also used and useful in additional functions including:

- Connecticut state data-matching between the Department of Social Services ("DSS") and Connecticut gas and electric utilities. The SSN is used as an automated back-up method to increase the low-income customer "match rate" between utility customers and households receiving means-tested public benefits for people whose addresses doesn't match because they've moved.
- Collections on past due balances from former customers who've left the service territory or those who apply to get new service without first having resolved their past due balance from their prior premise(s).