STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**OCTOBER 2, 2026**

THE OFFICE OF CONSUMER COUNSEL'S TWENTY FOURTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **October 16, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-901 through OCC-910 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-901. (SCRAF Mechanism) Please quantify the savings and benefits, if any, in carrying charges that the Company expects to result from implementation of the proposed SCRAF as compared with recovery under the current storm cost recovery framework. Provide all assumptions, calculations, and workpapers supporting the response.

OCC-902. (SCRAF Mechanism) Has the Company considered limiting SCRAF eligibility to storm events that also satisfy an objective storm-magnitude criterion, such as a Major Event Day designation under the IEEE Major Event Day methodology (2.5 Beta Method), a minimum number of customers interrupted, or a specified ERP tier or level, in addition to the proposed dollar-cost threshold?

a. If the Company didn't consider such criteria, please explain why.

b. If the Company considered and rejected such criteria, please provide any analysis performed and explain the basis for relying solely on a cost-based threshold.

c. If one or more of the three additional objective criteria in this question were to be adopted for the Company to be eligible for SCRAF recovery, if approved, discuss the implications and changes to storm preparation and response that the Company would consider adopting going forward?

d. Are there any other objective criteria that the Company would be comfortable adopting, in addition to the cost per event threshold, to be eligible for SCRAF recovery?

OCC-903. (Storm costs) Please provide an excel workbook with all of the following data points for each of the 14 catastrophic storm events in the 2025-2025 period the Company is seeking recovery for in this proceeding, as well as all the catastrophic storm events that were authorized for recovery in Docket 25-12-13 for the 2018-2023 time period:

a. Did the storm qualify as a Major Event Day designation under the IEEE Major Event Day methodology (2.5 Beta Method)? (yes or no)

b. What was the corresponding ERP level (Level 1-5) for each storm event as outlined in the Company's Emergency Response Plan?

c. What was the count of customers whose service was interrupted by the storm event?

d. Would the storm have met the 1% materiality threshold as calculated in OCC-6(a) (yes or no)?

e. The total cost of each storm event.

OCC-904. (Storm Cost Recovery) Please state what proportion of the catastrophic storms for which the Company is seeking recovery of costs in this proceeding were classified as Major Event Days under the IEEE Major Event Days methodology (2.5 Beta Method). In your response, provide all assumptions, calculations, and workpapers to support the following calculations:

a. Provide the cost of each storm event and the average cost of all catastrophic storm events that are classified as Major Event Days,
b. provide the cost of each storm event and the average cost of all the catastrophic storms that are not classified as Major Event Days.

OCC-905. (SCRAF Mechanism) In CLP-ELP-1, page 155, the Company cites the Massachusetts storm cost mechanism as a model.

a. Please identify every material difference between the Massachusetts mechanism and the proposed SCRAF, including the five-year amortization period, the prudence

review process, eligibility criteria or thresholds for recovery, and the carrying charge methodology.

b. Please identify other jurisdictions in which Eversource (or an affiliate) operates a storm cost recovery mechanism similar to the proposed SCRAF. Name any material differences between the other jurisdiction's adopted storm cost recovery mechanism and the proposed SCRAF. Explain why the Company has proposed a modification in the current proceeding. Provide the approved tariff or decision for each.

OCC-906. (Storm Cost Recovery) In 21-05-15RE01 - ES Comments on Revised Straw Proposal, page 44, the Company calculated the impact of setting the catastrophic storm cost materiality threshold equivalent to 1% of the Company's authorized annual base distribution revenue requirement for 2024. Please conduct a similar analysis, using the Company's proposed test year revenue requirement in this proceeding to calculate the resulting catastrophic storm cost materiality threshold using 1% of 2025 test year distribution revenue .

a. What is the dollar amount equivalent of the 1% materiality threshold for the 2025 test year?

b. What is the average count of non-catastrophic storms per year using (a) as the threshold for the last four years (2023-2025)?

c. Using (a), what would the average annual cost of non-catastrophic storm have been over the last four-year period? What is the standard deviation?

d. Provide an updated version of the table "Number of Storms Incurred" on page 45 of 21-05-15RE01 - ES Comments on Revised Straw Proposal using the Company's proposed threshold of $5.4 million and (a) for the last four years.

e. Provide an updated version of the table "Annual Non-Catastrophic Storm Costs" on page 46 of 21-05-15RE01 - ES Comments on Revised Straw Proposal using the Company's proposed threshold of $5.4 million and (a) for the last four years.

f. Provide a similar table as (e) for annual catastrophic storms using the Company's proposed threshold of $5.4 million and (a) for the last four years.

g. Please provide an updated calculation of the base distribution rates that would be necessary for non-catastrophic storms in the 2025 test year if the 1% materiality threshold from (a) was used. Explain the Company's rationale for the amount suggested. What is the percent change change from the current base rates proposed for non-catastrophic storms?

h. Discuss whether an increase, decrease, or no change in base distribution rates for catastrophic storms (i.e., catastrophic storm reserves of $60M) would be needed if (a) were used in this proceeding. Explain the Company's rationale.

OCC-907. (Storm Cost Recovery) For each calendar year from 2018 through 2025, please identify by ERP event level (Level 1 through 5, and events with no declared ERP level) the number of weather events declared under the Company's Emergency Response Plan, and the average total incremental cost of events within each ERP level, for each year.

OCC-908. (Storm Cost Recovery) In Exhibit CLP-STORM-1, page 82, the Company states: "[*T*]*he proportion of direct internal labor costs has increased, while the proportion of external labor costs has* ***decreased***.", but in the same document, page 39, the Company also states: "[*I*]*n most events, the Company now relies* ***more heavily*** *on external crews obtained through direct outreach to local, regional, and national contractors*." Please explain the inconsistency. In your response, please provide, for the 2024-2025 Storm Events compared with the 2018-2023 Storm Events:

a. the percentage of total labor cost that was internal versus external in each period; and

b. within the external-crew category only, the percentage that was mutual aid versus independent contractors in each period.

OCC-909. (Storm Cost Recovery) Of the $157 million in total costs, external line and tree crews represent 68 percent (Exhibit CLP-STORM-1 page 81). Please provide the Company's analysis of whether greater use of internal or affiliated resources, rather than non-affiliated contractors or mutual aid, was feasible for any of the events, and the basis for the resource mix actually chosen. In your response,

a. please describe, for each storm event, the process and personnel responsible for deciding to request mutual aid versus independent contractor crews, and the comparative cost of each option at the time the decision was made,

b. please provide all after-action reports for each storm event, including any internal criticism of restoration timing, crew sizing, or cost control.

OCC-910. (Storm Cost Recovery) Please explain the "*refinements to capitalization practices*" referenced as a driver of the shift toward internal labor costs in the 2024-2025 events compared to 2018-2023 (CLP-STORM-1, page 82), and quantify the dollar impact of this change on the amount sought for expense recovery versus capitalization.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Prabisha Bhandari
Prabisha Bhandari
Staff Attorney
10 Franklin Square
New Britain, CT 06051
860.827.2902

CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 2nd day of October, 2026.

By: /s/ Prabisha Bhandari
Prabisha Bhandari
Commissioner of the Superior Court