STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE	:	Docket No. 26-05-10
CONNECTICUT LIGHT AND	:	
POWER COMPANY D/B/A	:	
EVERSOURCE ENERGY TO	:	
AMEND ITS RATE SCHEDULES	:	September 8, 2026

THE INTERCONNECTION CUSTOMER COALITION'S
FIRST SET OF INTERROGATORIES

The Interconnection Customer Coalition ("ICC") requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") to the following interrogatories in the above-captioned proceeding on or before **September 22, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact Kate Boucher as soon as possible.

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 company'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 company 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 company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate 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 evidence that exists in foreign language.

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

custody or control of the company's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in your control if you have 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

ICC-1. Reference Exhibit CLP-ELP-1 at Page 109 and Exhibit CLP-CUSTOMER-1 at 34. Provide the currently operative versions of any Connecticut Light and Power Company governing documents related to the interconnection process, including, but not limited to, the Generator Interconnection Technical Requirements, the Information & Requirements for Electric Supply (a/k/a the "Yellow Book") and any other documents that specify interconnection timelines (together referred to herein as the "Eversource Interconnection Policies").

ICC-2. *Reference ICC-1*. Since January 1, 2020, provide all versions of the Eversource Interconnection Policies, including:

- Date of Revision
- Summary of Inclusions/Deletions
- Rationale for Inclusions/Deletions
- The review and approval process for finalization of each version

ICC-3. *Reference ICC-1*. Are any of the Eversource Interconnection Policies joint documents with United Illuminating? If so, state which ones and explain the timeline and purpose for which the document(s) were integrated.

ICC-4. *Reference ICC-1*. Provide the equivalent current versions of Eversource Massachusetts and Eversource New Hampshire Interconnection Policies. Explain in a narrative summary the differences between the Eversource Connecticut, Massachusetts and New Hampshire policies.

ICC-5. In a narrative response, describe the Eversource process for interconnecting a generation project in Connecticut, in the following categories:

a. Residential Inverter-Based Generators 50 kW or less;

b. Fast Track: Residential Inverters greater than 50 kW;

c. Commercial & Industrial less than or equal to 2 MW; and

d. Study Process: Complex projects greater than 2 MW.

Include relevant Eversource business units that must review/sign off/be consulted, describe approvals to move on to the next stage, and required timelines or deadlines that must be met.

ICC-6. *Reference ICC-5*. For each Eversource business unit described in the response, provide in a chart, current, proposed and near-term staffing plans, as follows:

Business Unit	**Current Staffing Numbers (Internal and Contractors, separated)**	**Proposed Staffing Changes Under This Rate Case**	**Proposed Staffing Changes Within the Next 5 Years**

ICC-7. *Reference ICC-5*. Describe any consequences if the Interconnection Customer does not meet the identified timelines.

ICC-8. *Reference ICC-5*. Describe any consequences if Eversource does not meet the identified timelines.

ICC-9. *Reference ICC-5*. Eversource has proposed competitive base salary and variable compensation, and intends to hire 58 new employees to support these initiatives. *See* Exhibit CL&P-REVREQ-2, WP C-3.5 – Incremental FTE Calculation. Specifically identify if any of these new employees will support interconnection process activities as identified in ICC-5. Also specifically describe any related plans to hire/retain

contract employees to support interconnection process activities as identified in ICC-5.

ICC-10. *Reference ICC-5.* Provide any Eversource policies governing internal review timelines for identified interconnection process review and describe how employees are trained on these policies. Provide all training related to adherence to timelines. Identify the revision date of the relevant training, how often it is updated, and whether review of such training is mandatory for employees.

ICC-11. *Reference ICC-6.* In a chart, provide monthly mean, median and average time each identified Eversource department spent reviewing interconnection applications since January 1, 2020.

ICC-12. Provide a chart showing the annual number of a) Interconnection Applications received and b) Interconnection Agreements issued in each calendar year from 2010-2026.

ICC-13. Since January 1, 2020, provide mean, median and average times for each month quantifying the length of time between when an Interconnection Application was initially received to when an Interconnection Agreement was issued.

ICC-14. Since January 1, 2020, provide mean, median and average times for each month quantifying the length of time between when an Interconnection Agreement was issued and when a project received its Permission to Operate.

ICC-15. *Reference ICC-13 and ICC-14.* Provide a chart showing the same information based on the following project categories: buy-all to new service (i.e., NRES/SCEF), buy-all to existing service, and netting projects.

ICC-16. *Reference ICC-13 and ICC-14.* Provide a chart showing the same information based on the following project categories: Residential Inverter-Based Generators 50 kW or less; Fast Track: Residential Inverters greater than 50 kW; Commercial & Industrial less than or equal to 2 MW; and Study Process: Complex projects greater than 2 MW.

ICC-17. *Reference Exhibit CLP-ELP-1 at Page 109 and Exhibit CLP-CUSTOMER-1 at 34.* Describe any and all data Eversource currently uses to track whether it is meeting its own milestones in interconnection agreements. Provide software used, describe which milestones are tracked. Provide the most current outputs showing whether Eversource is currently meeting those milestones.

ICC-18. *Reference ICC-19.* Describe whether and if so how this data is used internally by Eversource to refine processes, train employees or propose changes to Eversource Interconnection Documents. Specifically describe whether this data is used to determine appropriate staffing, employee incentives and/or compensation in any manner.

ICC-19. Provide in a chart, separated by year: 1) the number of formal interconnection disputes initiated, 2) the number of formal interconnection disputes that required mediation, 3) the number of formal interconnection disputes that required PURA adjudication.

ICC-20. Provide:

a. current template Interconnection Agreement(s) for Connecticut projects;
b. current template Interconnection Agreement(s) for New Hampshire projects; and
c. current template Interconnection Agreement(s) for Massachusetts projects.

The undersigned certifies that a copy of this submission has been sent to all participants of record via electronic mail. A copy of this document also has been filed with the Authority as an electronic web filing and is complete.

Respectfully submitted,

THE INTERCONNECTION CUSTOMER COALITION



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Kathryn E. Boucher, Esq.
Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103
keboucher@pullcom.com
lhoffman@pullcom.com
(860) 424-4300