Date Filed: October 16, 2026

Witness: Warren R. Boutin and Andrew C. Belden
Request from: ALLCO

Question:

(Follow-up to ICC-011, ICC-017, and ALLCO-017 — PowerClerk milestone data.) The Company's responses to ICC-011 and ICC-017 state that PowerClerk records "application status changes which are then used to track milestones," and its response to ALLCO-057 states that the figures provided were "derived from PowerClerk." Its response to ALLCO-017 states that the Company "does not track" the time between its receipt of a generator-executed interconnection agreement and its countersignature. (a) Identify each status, milestone, and date field that PowerClerk records for an application, and state for each whether a timestamp is captured automatically or entered manually. (b) For each Allco Application, produce the complete PowerClerk status-change history with the date and time of each status change, including the dates the application was received, deemed complete, screened, studied, approved (contingent or otherwise), the date an interconnection agreement was issued, the date a generator-executed agreement was received, the date of the Company's countersignature, and the date of Permission to Operate. (c) For all Level 2 and Level 3 applications received from January 1, 2019 through the present, produce in native Excel format the same fields listed in (b). (d) State whether, in light of (a) through (c), the Company withdraws the statement in its response to ALLCO-017 that it "does not track" countersignature timing, and if not, reconcile that statement with the data PowerClerk records.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Without waiving said objections, there are 140 different statuses in PowerClerk, and each of these statuses reflect that a project is online, in queue or withdrawn. Further, there is no discrepancy among ALLCO-017[i], ICC-011[ii], and ICC-017[iii]. Prior to 2026, Interconnection Agreements were

executed outside of PowerClerk and subsequently uploaded to PowerClerk after being signed by all parties thereto. Therefore, consistent with the Company's response to ALLCO-017, this information was not tracked, either in or outside of PowerClerk.

Prior Referenced Responses:

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[i] ALLCO-017 Question:

State the average and maximum elapsed time, in each year 2019 through 2025, between the Company's receipt of an interconnection agreement executed by a Connecticut generator and the Company's countersignature and return of that agreement, and identify each instance exceeding 180 days, including project LEG-22708.

ALLCO-017 Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company does not track information on the average and maximum elapsed time between the receipt of a partially-executed interconnection agreement ("IA") from a Generator and the Company's countersignature and return of the fully-executed IA to the Generator. Starting in early 2026, the IA execution process was enhanced to leverage automation available in PowerClerk; therefore, the execution dates are now recorded electronically in a software platform.

[ii] ICC-011 Question:

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-011 Response:

The information requested is not reflected by department. Eversource uses PowerClerk to track application status changes which are then used to track milestones. The milestones include the total time for example; from the application received date to the contingent approval issued date. In this timeframe multiple departments may review an application, but the milestone encompasses the total time between the received date and the contingent approval issued date. Please refer to the Company's response to ICC-017

[iii] ICC-017 Question:

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-017 Response:

The testimony referenced is specific to the Level 1 DER Interconnection metric. Eversource uses PowerClerk, the interconnection application portal, to track application status changes which can be used to track milestones. Eversource currently files data on application milestones on a quarterly basis for projects participating in the Residential Renewable Energy Solutions (RRES) program, which accounts for the vast majority of Level 1 applications. The most recent of these filings is the Compliance Filing to Order 13 in Docket No. 26-08-02, submitted July 28, 2026, refiled here as ICC-017, Attachment 1. While these milestones are tracked within the RRES program, there are no specified milestone targets within that program for the Level 1 DER Interconnection metric