Date Filed: October 16, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Leanne M. Landry, Warren R. Boutin, and Marisa B. Paruta
Request from:

Question:

(Follow-up to ALLCO-055 — Burns & McDonnell charges billed to interconnection customers.) The Company's response to ALLCO-055 states that $752,873 was paid to Burns & McDonnell for services relating to Connecticut distributed generation interconnection, that those amounts "are not in the cost of service or rate base," and that they "are recorded to FERC Account 186010, and are then billed to customers / counterparties for reimbursable work." (a) For each year 2018 through 2025 and the Test Year, state the total Burns & McDonnell charges recorded to Account 186010 for Connecticut DG interconnection work and the total billed to interconnection customers, and identify each Allco Application to which any such charge was billed, the amount, the date, and the invoice or work-order reference. (b) State whether any percentage overhead, CIAC, or other loader was applied to Burns & McDonnell charges when billed to interconnection customers, and if so identify the loader and percentage. (c) State whether the project-management and administration functions performed by Burns & McDonnell are the same functions for which the Company applies a project-management, administration, or overhead percentage to interconnection customers, and if not, describe the difference. (d) State the total Test Year and Rate Year cost of administering the Connecticut DG interconnection program that is recovered from ratepayers through the revenue requirement (ALLCO-010: $1,257,007 / $1,342,362) and, separately, the total amount of administration, project-management, or overhead charges collected from interconnection customers in each year 2018 through 2025, and explain how the Company ensures the same administrative cost is not recovered from both ratepayers and interconnection customers.

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 objection, please refer to the Company's responses to ALLCO-044 [i]and ALLCO-109[ii]. The Burns & McDonnell charges recorded to FERC Account 186010 are $138,311 for 2023, $311,706 for 2024, and $752,873 for 2025. No charges were recorded to the account for each year 2018 through 2022.

Prior Referenced Response:

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[i] ALLCO-044 Question:

With respect to each cost category included in the percentage overhead or "CIAC" rates applied to interconnection upgrade, study, and construction costs charged to distributed generation, qualifying facility, and other interconnection customers (including, without limitation, project management, engineering and supervision, administrative and general expense, employee benefits or compensation loaders, insurance, and Eversource Energy Service Company charges): (a) identify each such cost category and its share of the overhead rate in effect in each year 2018 through 2025; (b) state whether the costs in each such category were included, in whole or in part, in the test-year cost of service and revenue requirement approved in the Company's most recent prior general distribution rate proceeding, Docket No. 17-10-46, and therefore recovered from all ratepayers through base distribution rates during 2018 through the present; (c) if the answer to any part of subpart (b) is affirmative, explain why applying overhead rates that include the same cost categories to amounts charged to interconnection customers does not result in the Company recovering the same costs twice — once from ratepayers generally and again from interconnection customers; (d) quantify, for each year 2018 through 2025, the total dollar amount of overheads collected from interconnection customers in cost categories that were also reflected in base rates; and (e) state whether amounts collected from interconnection customers through overhead rates are recorded as a credit or offset to the corresponding expense or plant accounts recovered in base rates and, if not, where those amounts are recorded, consistent with the Company's description of its netting treatment of third-party attacher billings in its response to RRU-002.

ALLCO-044 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, please note that capital expenditures (direct costs and overheads applied to those amounts) are entirely billed to the interconnection customer and reimbursed through the CIAC process; therefore, these asset additions are not included in rate base. Please refer to ALLCO-064i for additional discussion on the CIAC rate and ALLCO-003ii where the Company goes into more detail on the CIAC Tax Adder.

[ii] ALLCO-109 Question:

Identify the agreement or agreements under which Burns & McDonnell performs interconnection-related functions for the Company, and produce each, including statements of work: (a) describe the functions Burns & McDonnell performs — application processing, study administration, cost estimating, account maintenance, final accounting, refund administration, or otherwise; (b) state the basis on which Burns & McDonnell is compensated, and state

whether any component of its compensation varies with the amounts estimated, billed, or collected from interconnecting customers; (c) identify, by title, the Burns & McDonnell personnel who perform the final accounting and refund-administration functions and the CL&P or ESC personnel who supervise them; and (d) state whether Burns & McDonnell's costs are recovered through the interconnection overhead loaders, through the approximately $1.257 million annual interconnection program administration cost identified in ALLCO-010, through base rates, or through some combination, and quantify each component for the test year

ALLCO-109 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 states as follows:

a. The functions performed by Burns and McDonnell are related to Construction Project Management and Analysis that support the Project Manager.

b. Burns and McDonnell employees charge their time to individual work orders. The charges are applied against the customer payments. The compensation does not vary with the amounts estimated, billed or collected from interconnecting customers.
c. The employees performing this work include DER Construction Project Management and Analysts

d. The Burns & McDonnell costs are not recovered through the approximately $1.257 million annual interconnection program administration costs identified in ALLCO-010[i], as stated in the Company's response to ALLCO-055