STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**DOCKET NO. 26-05-10**
	:	**August 4, 2026**

CONNECTICUT INDUSTRIAL ENERGY CONSUMERS
FIRST SET OF INTERROGATORIES

The Connecticut Industrial Energy Consumers ("CIEC") requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P," or "Eversource") to the following interrogatories in the above-captioned proceeding by **August 18, 2026**. If there are any objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel 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 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 document.

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 requests 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 is adopted by the Authority in this Docket.

INTERROGATORIES

The following Interrogatories, designated as CIEC-1 through CIEC-15, are directed to the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company").

CIEC-1. **(Executive Leadership Panel)** With reference to page 21 of the Executive Leadership Panel's Direct Testimony, state whether the Company is advancing any proposal in this proceeding that would promote, allow, or otherwise enable utility ownership of generation. If the Company is advancing any such proposal in this

proceeding, provide a reference to the testimony where the proposal(s) may be found.

CIEC-2. **(Executive Leadership Panel)** With reference to page 29 of the Executive Leadership Panel's Direct Testimony, provide the approximate percentage of the average Rate 39 bill in 2025 represented by public benefit programs.

CIEC-3. **(Executive Leadership Panel)** With reference to page 29 of the Executive Leadership Panel's Direct Testimony, provide the approximate percentage of the average Rate 57 bill in 2025 represented by public benefit programs.

CIEC-4. **(Amparo Nieto (ACOSS))** With reference to page 6 of Nieto's Direct Testimony, confirm that meter reading costs were allocated within each class, such that no class is assigned responsibility for costs to read the meters of customers in a different class.

CIEC-5. **(Amparo Nieto (ACOSS))** Explain the rationale behind the decision to allocate meter plant as described on page 6, lines 21 through 25, of Nieto's Direct Testimony. Include in your response workpapers in their native format with all cells and formulae unlocked (if applicable) that demonstrate how the meter plant allocators were determined.

CIEC-6. **(Amparo Nieto (ACOSS))** Provide an electronic copy of the allocated cost-of-service study with all formulas and links intact.

CIEC-7. **(Amparo Nieto (MCOSS))** Provide an electronic copy of the marginal cost-of-service study with all formulas and links intact.

CIEC-8. **(Capital Additions Panel)** For each of the past 10 calendar years, specify:

a. the capital expenditure budget broken down by investment in the transmission, sub-transmission, primary, and secondary systems; and

b. the amount of actual capital expenditures, broken down by investment in the transmission, sub-transmission, primary, and secondary systems.

CIEC-9. **(Capital Additions Panel)** For each year of Eversource's current five-year capital plan, specify the proposed capital expenditure budget broken down by investment in the transmission, sub-transmission, primary, and secondary systems.

CIEC-10. **(Capital Additions Panel)** Specify the total number of customers served by Eversource during each of the last ten years.

CIEC-11. **(Revenue Requirements Panel)** Specify Eversource's total 2026 revenue requirement broken down by revenues recovered through distribution rates, Rate

Adjustment Mechanisms ("RAM"), and any other category designation utilized by the Company.

CIEC-12. **(Revenue Requirements Panel)** Specify:

a. Each currently-approved deferral mechanism; and

b. Each new deferral mechanism proposed in the rate filing.

CIEC-13. **(Revenue Requirements Panel)** Specify:

a. Each currently-approved reconciliation mechanism; and

b. Each new reconciliation mechanism proposed in the rate filing.

CIEC-14. **(Anne E. Bulkley)** Provide the following for Eversource and all parent, holding, and service companies:

a. The most recent shareholder's report;

b. The latest credit reports from all credit reporting agencies;

c. The latest presentations made to credit rating agencies;

d. The latest investor presentation; and

e. Equity analyst reports issued within the last three months.

Please update this response during this proceeding if relevant reports, presentations, or analyses are available after the date of your initial response.

CIEC-15. **(Employee Compensation and Benefits Panel)** Does the Company's variable pay program include any employee incentive tied to capital additions? If the answer is in the affirmative, identify and explain in detail each such incentive.