Date Filed: November 16, 2026

Witness: Jared A. Lawrence, Douglas P. Horton, Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

Please refer to the AMI Panel Testimony at page 19, lines 1-6, and Exhibit CLP-AMI-3 at pages 16-17 (Figure 6).

a. Figure 6 shows $309.2 million of six-year capital for "Meters," consisting of $302.4 million for Meters and $6.8 million of Undepreciated Meter Balance. Please separate the $302.4 million into (i) meter equipment and (ii) meter installation labor and other costs, and identify the amount the Company expects to record in FERC Account 370.

b. For each cost category shown in Figure 6, please identify the FERC account or accounts in which the Company expects to record the capital investment.

c. Please identify the VVO Enablement facilities (e.g., substation and line equipment, software) included in the $97.3 million of six-year VVO Enablement capital shown in Figure 6, and state whether the Company proposes to recover those costs through the PBMRP as AMI costs or through another mechanism, and how it proposes to classify and allocate those costs to rate classes.

Response:

a. A full breakdown of the six-year capital for meters is shown in the table below[1]. Please refer to CLP-AMI-3 starting on page 108 for a complete breakdown of all capital.

6-Year Meters – Nominal Capital Cost	
Meters - Deployment	$208.8M
External Labor – Deployment	$51.8M
Internal Labor – Deployment Returns/Follow-ups	$7.0M
Meters – Replacements	$2.8M
Internal Labor - Replacements	$1.1M
Corporate Overhead	$3.8M
Contingency	$27.1M
Total	**$302.4M**

[1] Note: these are rounded figures.

The Company expects to record the full cost of the meter equipment, the cost to install, and all associated costs, including overhead costs and allocations, to FERC Utility Account 370 - Meters. Please see Table 1 below.

b. For each cost category shown in Figure 6, please see Table 1 below, which provides the Plant FERC Utility Account in which the Company expects to record the capital investment, once it is placed in service and unitized (final as built) to FERC Account 101010 (Electric Plant in Service).

Cost Category	Capital Investment / O&M Expense	Plant FERC Utility Account
Meters	Meters	370 – Meters & Metering Equipment
Communications	Communications Upgrades	370 – Meters & Metering Equipment
Back Office Systems	Meter Data Management System (MDMS)	363.1 – Computer Hardware; 363.2 - Computer Software
	Customer Information System (CIS)	363.1 – Computer Hardware; 363.2 - Computer Software
	Load Settlement	363.1 – Computer Hardware; 363.2 - Computer Software
Labor and Standard Operating Plan	Organizational Readiness	363.1 – Computer Hardware; 363.2 - Computer Software
	Contact Center	363.1 – Computer Hardware; 363.2 - Computer Software
	Revenue Assurance (Non-Technical Line Loss)	363.1 – Computer Hardware; 363.2 - Computer Software
Supporting Services and Platforms	OMS Integration	363.1 – Computer Hardware; 363.2 - Computer Software
	Customer Experience Portal	363.1 – Computer Hardware; 363.2 - Computer Software
	Engineering and Customer Usage Analytics	363.1 – Computer Hardware; 363.2 - Computer Software
	Green Button Connect	363.1 – Computer Hardware; 363.2 - Computer Software
VVO Enablement	VVO Enablement	363.1 – Computer Hardware; 363.2 - Computer Software; 363.3 - Communication Equipment 368 - Line Transformers 362 - Station Equipment
Customer	Customer Engagement	N/A
Data	Cybersecurity	363.1 – Computer Hardware; 363.2 - Computer Software
	Data Storage and Processing	N/A

c. A listing of the VVO Enablement facilities is shown in the table below. As described in the Company's response to CIEC-040[i], the Company expects that AMI meter costs will be properly classified as customer-related costs, consistent with treatment of meter costs in the allocated cost-of-service study conducted and submitted in this docket as part of the Company's Rate Application. The Company's further expectation is that capital costs and expenses associated with AMI implementation would be collected from customers

consistent with allocation of costs and rate design allowed in this proceeding for distribution rates or another applicable rate mechanism.

6-Year VVO Enablement – Nominal Capital Cost	
Regulators	$37.5M
Capacitors	$27.3M
Transformer LTC Controller Upgrades	$16.0M
Integration - Software	$0.5M
Integration – External Labor	$1.0M
Integration – Internal Labor	$0.5M
Corporate Overhead	$0.5M
Contingency	$8.3M
AFUDC	$5.7M
Total	**$97.3M**

Prior Referenced Responses:

[i] CIEC-040 Question:

Please refer to the AMI Panel Testimony at page 20, lines 9-21.

a. Please confirm that, as stated at lines 9-11, the Company must be able to accurately and timely bill customers for service, and metering infrastructure is necessary to that end.
b. Please confirm that, as stated at lines 12-15, the Company expects to migrate to AMI as its existing AMR meters reach the end of their useful lives, regardless of the BCA results.
c. Please explain the statement at lines 18-20, that "optionality in taking advantage of many AMI benefits will be within the customer's control," and identify the AMI benefits in Exhibit CLP-AMI-3, to which that statement applies.
d. When AMI meter costs are reflected in base distribution rates, does the Company intend to continue classifying AMI meter costs as customer-related, consistent with its treatment of meter costs in the ACOS Direct Testimony at page 4, lines 5-7? If not, explain why not.

CIEC-040 Response:

a. Yes, the Company must always be in a position to bill customers for service on a timely and accurate basis and metering infrastructure is necessary to that end. However, the manner in which the Company achieves this objective can take several forms.
b. Based on the information available to the Company today, and the expectation that PURA and stakeholders' consideration of the AMI Implementation Plan would benefit from a comparison with an AMR lifecycle alternative approach, the Company presented an analysis of a hypothetical AMR end-of-life scenario in its BCA. Should PURA not grant approval of the Company's proposed AMI Plan, the Company would develop and consider alternative scenarios using the best information at that time, including an AMR end-of-life approach, in view of any additional guidance PURA provides in its order.
c. The quantified AMI benefits largely within customer control are associated with their choice of participation in Time-of-use/Time-varying Rates. The non-quantified benefits largely within customer control arise in

relation to their election to receive outage restoration notifications; their receptiveness to detailed billing data and notifications; and their receptiveness to load disaggregation insights.

d. Yes, the Company expects that AMI meter costs will be properly classified as customer-related costs, consistent with treatment of meter costs in the allocated cost-of-service study conducted and submitted in this docket as part of the Company's Rate Application. The Company's further expectation is that capital costs and expenses associated with AMI implementation would be collected from customers consistent with allocation of costs allowed in this proceeding for distribution rates or another applicable rate mechanism.