STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**AUGUST 20, 2026**

THE OFFICE OF CONSUMER COUNSEL'S NINTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **September 3, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. 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 documents.

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 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

Interrogatories OCC-423 through OCC-448 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

For the following interrogatories, please provide all workpapers, models, source data, assumptions, calculations, project lists, benefit-cost analyses, forecasts, presentations, internal approval materials, and supporting documents relied upon to develop the amounts, benefits, timing, and rate impacts referenced in the response. Provide all Excel workbooks in native Excel format with formulas, links, pivot tables, macros, named ranges, metadata, and source tabs intact. Do not provide flattened PDFs in lieu of native files. If a value was developed outside Excel, provide the native source file, data dictionary, calculation methodology, and all inputs necessary to replicate the result.

Leadership Panel Exhibit CLP-ELP-1

OCC- 423. Please explain in detail why the Company believes its proposed treatment of capital expenditures under the PBMRP, including the use of forecasted capital expenditures

and the F-Factor, is preferable to including capital expenditures within the Revenue Cap Formula framework as proposed in the Docket No. 21-05-15RE01 Proposed Final Decision. In your response,

a. Please explain why the Company believes O&M expenses are appropriately subject to an externally indexed revenue cap, while capital expenditures require separate recovery through an F-Factor based on a fixed annual capital investment forecast.
b. Please explain how the Company's proposed treatment of capital expenditures is expected to produce customer cost savings or otherwise improve customer affordability relative to including capital expenditures within a revenue cap formula.
c. Please explain how the proposed F-Factor mitigates or avoids any incentive to favor capital expenditures over O&M solutions, including in circumstances where either a capital or O&M solution could be used to address the same system need.

OCC- 424. Please compare the Company's forecasted annual capital expenditures for each year of the proposed PBMRP to the Company's actual annual capital expenditures and plant additions placed in service for each of the past 10 years.

OCC- 425. Please compare the Company's annual capital expenditures per customer to the annual capital expenditures per customer of comparable electric distribution companies for each of the past 10 years. Please provide the average annual capital expenditures per customer for the Company and each comparable utility over the period and identify the percentage by which the Company's average is above or below the peer-group average and median. Provide all underlying data, sources, and calculations in an unlocked Excel workbook with formulas intact.

OCC- 426. Please describe how the proposed process for recovering incremental investments in a subsequent base rate proceeding or successor PBMRP Term if actual capital spending exceeds the forecasted amount will support utility cost containment. Please describe the Company's proposed process for review of excess incremental investments in a subsequent base rate proceeding or successor PBMRP term.

OCC- 427.Please explain in detail why the Company proposes to use the F-Factor methodology for recovery of incremental capital investment during the PBMRP rather than the CT-Bar methodology proposed in Docket No. 21-05-15RE01. In your response, identify each material difference between the proposed F-Factor and CT-Bar and explain why the Company believes each such difference is necessary or appropriate.

OCC- 428. Please provide the annual value of the composite O&M input price index used in the Company's proposed I-Factor for each of the past 20 years. Please also compare the annual composite O&M input price index to economy-wide inflation over the same period, including the annual percentage-point difference between the two measures. Please provide all calculations in an unlocked Excel workbook with formulas intact.

OCC- 429. Please elaborate on the reasoning for the Company's proposed zero percent floor for the I-Factor. If the I-Factor is intended to reflect external inflationary pressures on the Company's O&M costs, please explain why the I-Factor should not reflect periods in which the applicable inflation index is negative. Please explain how, under the Company's proposal, declining external cost pressures or deflation would be reflected in the Company's allowed revenues.

OCC-430. Please explain in detail how the Company determined that a threshold significance of 0.5% of total distribution revenue is appropriate for Z-Factor eligibility. Please explain why the Company proposes a 0.5% threshold rather than the 0.75% threshold proposed in the Docket No. 21-05-15RE01 Proposed Final Decision, and provide all analyses, calculations, benchmarks, or other information relied upon in selecting the proposed 0.5% threshold.

OCC-431. Please explain in detail how the Company determined that a minimum of 30 basis points for the S Factor (Customer Dividend) is appropriate, including all analyses, assumptions, benchmarks, or other considerations relied upon in selecting 30 basis points. Please identify and compare the stretch factors adopted in other jurisdictions that the Company considered in developing its proposed 30-basis-point minimum, including the jurisdiction, utility, applicable percentage or basis-point adjustment, and date and docket of adoption.

OCC-432. Please provide a historical calculation of the S-Factor for each of the last 20 years using the methodology proposed by the Company. For each year, provide (a) the Company's Core Operating Expense per customer; (b) the applicable inflation-adjusted benchmark; (c) the percentage by which Core Operating Expense per customer was above or below the benchmark; and (d) the resulting S-Factor that would have applied under the Company's proposed methodology. Please provide all calculations in an unlocked Excel workbook with formulas intact.

OCC-433. Please explain why the Company has not proposed specific off-ramp provisions as part of its PBMRP. Please identify any provisions of the proposed PBMRP that the Company believes provide protections analogous to an off-ramp and explain how each provision would protect customers from financial or other adverse consequences

arising from circumstances in which continuation of the PBMRP would no longer produce just and reasonable rates.

OCC 434. Please compare the Company's proposed $5.4 million threshold for catastrophic storm cost deferral treatment to a threshold equal to 1% of the Company's authorized distribution revenue requirement, as contemplated in the Docket No. 21-05-15RE01 Proposed Final Decision. Please quantify the dollar amount represented by a 1% threshold using the Company's proposed revenue requirement and explain why the Company believes the proposed $5.4 million threshold is more appropriate than a materiality threshold of 1% of the Company's revenue requirement.

OCC-435. Please quantify the incremental annual revenue requirement for each Rate Year attributable solely to including WACC/return on rate base in the F Factor.

Rates Panel Exhibit CLP-RATES-3

OCC-436. Please clarify whether, in any Rate Year, the Company may recover the revenue requirement in excess of the Forecasted Budget amount included in the F-Factor allowance for that Rate Year that may result from capital additions placed in service in a prior year that have not yet been reflected in base rates. In your response, please:

a. Explain the circumstances under which F-Factor recovery may exceed the Forecasted Budget amount for the applicable Rate Year;
b. Explain how the revenue requirement associated with prior-year capital additions is calculated and incorporated into the F-Factor;
c. Explain whether such prior-year capital additions are subject to the same annual downward-only reconciliation and Forecasted Budget cap as capital additions placed in service during the applicable Rate Year;
d. Explain how recovery of prior-year capital additions is consistent with the Company's characterization of the Forecasted Budget as a cap on capital recovery during the PBMRP term; and
e. Explain how this treatment supports the Company's stated customer affordability and rate-stability objectives and preserves the customer protections associated with the downward-only reconciliation.

Revenue Requirements Exhibit CLP-REVREQ-1

OCC 437. Please explain in detail why the Company proposes to include forecasted capital additions through the end of the Rate Year in going-in rates rather than establishing plant-in-service and accumulated depreciation for inclusion in base rates as of the close of the evidentiary record, with pro forma additions, retirements, and adjustments through that date, as included in the Docket No. 21-05-15RE01 Proposed Final

Decision. Please also explain what mechanisms the Company will use to ensure that the same capital investment is not recovered through both going-in rates and the F Factor. Please explain how the Company's proposal affects customer affordability and rate stability compared with limiting going-in rates to plant-in-service as of the evidentiary-record cutoff and recovering subsequent incremental capital through the F Factor.

OCC 438. Please explain why the Company has not excluded costs associated with its participation in rate case proceedings from the revenue deficiency calculation in this proceeding. In your response, please explain how the Company's proposed treatment of such costs complies with the requirements of SB 7, *An Act Strengthening Protections For Connecticut's Consumers Of Energy*, concerning recovery of costs associated with participation in rate case proceedings.

Exhibit CLP-ELP-3

OCC 439. Please identify each Metric and Scorecard adopted in the final Docket No. 21-05-15RE02 Performance Evaluation System that is not included in the Company's proposed performance portfolio. For each omitted Metric or Scorecard, please explain why the Company did not propose to include it and identify any analysis, data, or other information supporting that determination.

OCC- 440. Please identify each Metric and Scorecard adopted in the final Docket No. 21-05-15RE02 Performance Evaluation System that the Company proposes to implement differently from the RE02 design. For each, please identify and explain each substantive difference and the basis for the Company's proposed approach, including any analysis, data, or stakeholder input relied upon.

Exhibit CLP-PBR-1 PBR Testimony

OCC-441. Please explain in detail why LEI and the Company rely on the national 2005–2024 OM&A PFP estimate of -0.03% to establish the proposed X Factor rather than the Northeast Region OM&A PFP estimates presented in Exhibit CLP-PBR-2.

a. Exhibit CLP-PBR-2 (page 23) states: "*However, if the range of data is too long, the estimated average trend may be irrelevant for the purposes of informing future ratemaking initiatives. The timeframe should ideally incorporate more recent data that captures the latest trends in the industry while eliminating earlier time periods with productivity growth drivers that are no longer relevant*." Please explain why the 2005–2024 period is more representative of expected OM&A productivity during the proposed PBMRP term than the more recent periods.

OCC- 442. Please identify each electric utility PBR plan reviewed by LEI in which the X Factor applicable to an OM&A-only revenue cap was established based on an OM&A partial factor productivity measure. For each plan, please provide:

a. The utility and jurisdiction;
b. The applicable period;
c. OM&A PFP or other productivity estimate;
d. The approved X Factor;
e. The inflation index paired with the X Factor;
f. The study period and peer group used to calculate productivity; and
g. Whether the regulator adopted, modified, or rejected the utility's proposed productivity factor.
h. Please explain any material differences between each identified precedent and the Company's proposed methodology.

OCC- 443. Please explain quantitatively how LEI's benchmarking results support a 0.30% Consumer Dividend. Please explain how the Company's proposed 0.30% Consumer Dividend was derived from or otherwise informed by:

a. The Company's 22.9% average OM&A cost gap under the unit cost benchmarking analysis;
b. The Company's 11.9% average OM&A cost gap under the 2015–2024 econometric benchmarking analysis; and
c. The Company's 16.4% average OM&A cost gap under the 2021–2024 econometric benchmarking analysis.
d. Please provide any calculations, assumptions, analyses, or methodologies used to translate the identified efficiency gap into an annual achievable improvement.
e. Please explain why the widening gap does not support a Consumer Dividend greater than 0.30%, and provide all analyses relied upon in reaching that conclusion.

OCC- 444. Please provide the complete econometric specification and diagnostic testing underlying each preferred benchmarking model, including:

a. Whether the model is pooled OLS, fixed-effects, random-effects, or another panel-data specification;
b. The basis for the selected panel-data specification and the results of any specification tests performed;
c. How the models account for utility-specific unobserved heterogeneity;
d. How standard errors account for repeated observations for the same utility over time, including whether standard errors are clustered at the utility level;
e. Results of tests for serial correlation, heteroskedasticity, multicollinearity, influential observations, and model specification error; and

f. All alternative model specifications tested and the resulting the Company benchmarking results under each specification.

OCC- 445. Please provide a sensitivity analysis showing the US industry OM&A PFP over the 2005–2024 study period excluding the 2019–2020 observation. Please provide the resulting average annual OM&A PFP and corresponding X Factor.

OCC- 446. Please explain the extent to which the 2019–2020 observation affected the magnitude and direction of the 2005–2024 average OM&A PFP. Did LEI evaluate whether productivity changes during the COVID-19 pandemic period is representative of the productivity trends that may reasonably be expected during the proposed PBMRP term? If yes,

a. Please provide all underlying data and calculations in an unlocked Excel workbook with formulas intact.

OCC- 447. Please identify the annual OM&A PFP for each year from 2005 through 2024 and identify the three years with the largest positive and negative annual OM&A PFP values. For each such year, please explain the primary drivers of the observed change in OM&A PFP.

OCC- 448. Please explain the basis for LEI's conclusion that the Company's above-benchmark OM&A costs do not necessarily indicate lower operating efficiency but instead reflect the Company's historical reliance on OM&A expenditures relative to capital-related expenditures. In your response:

a. Please identify any quantitative analysis performed by LEI demonstrating a relationship between the Company's below-benchmark capital costs and its above-benchmark OM&A costs;
b. Please explain whether LEI tested whether the Company's above-benchmark OM&A costs would remain after controlling for differences in capital investment, capital intensity, asset age, or other factors that may affect the relationship between capital investment and OM&A expenses;
c. Please explain how LEI distinguishes, in its benchmarking analysis, between above-benchmark OM&A costs attributable to a different capital-versus-OM&A spending strategy and above-benchmark OM&A costs attributable to lower operating efficiency.

Respectfully submitted,

STATE OF CONNECTICUT OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Andrew W. Minikowski
Andrew W. Minikowski, Esq.
Agency Legal Director
10 Franklin Square New
Britain, CT 06051
860.827.2924

CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at East Haddam, Connecticut this 20th day of August, 2026.

By: /s/ Andrew W. Minikowski
Andrew W. Minikowski, Esq.
Commissioner of the Superior Court