Date Filed: October 15, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

(ALLCO-034(d) — the legal advice on § 16-243p(b).) The Company's response to ALLCO-034(d) states that it "has been advised by legal counsel that the confidentiality-designation and redaction work does not fall within any of the enumerated classes or categories of costs that are ineligible for recovery through rates under Conn. Gen. Stat. § 16-243p(b)" because the work is "incurred to comply with legal obligations governing disclosure of public records and confidential information." (a) Identify the counsel (firm and individual) who gave that advice, the date(s) on which it was given, and whether it was given orally or in writing. Produce each opinion, memorandum, letter, e-mail, or other document containing or reflecting the advice. (c) If the Company withholds any such document on a claim of privilege, identify for each its date, author, recipients, subject matter, and the privilege claimed, and state whether the Company intends to rely on the advice of counsel, in whole or in part, to support recovery of any cost in this proceeding. (d) State, in the Company's own words and with reference to the text of § 16-243p(b), each reason the Company contends that confidentiality-designation and redaction work performed for filings and discovery responses in this proceeding is not a "direct or indirect cost[] associated with its … participation in" this rate proceeding; whether fees paid or payable to Keegan Werlin LLP for that work are "attorneys' fees" within the statute; and whether the time of the Company's internal legal counsel and project-management staff devoted to that work is "the portion of employee salaries associated with such participation." (e) Identify every other category of cost of this proceeding that the Company contends is recoverable on the rationale that it is "incurred to comply with legal obligations," stating for each the amount and the revenue-requirement schedule and line in which it appears.

Response:

CL&P objects to this request on the ground that it seeks information protected by the attorney-client and attorney work product privileges.

CL&P further objects to this request on the ground that it calls for a legal conclusion.

Without waiving said objections, the legal advice in the Company's response to ALLCO-034[i] subpart (d) was given during the process of responding to this request. No separate legal document was prepared for the purpose of responding to this subpart.

Prior Referenced Response

[i] ALLCO-034 Question:

The Company's September 1, 2026 "Redacted Bulk Material" filing describes the preparation of public, redacted versions of Exhibit CLP-STORM-ACCT-2(A) as "a manual, labor-intensive process involving a cross-functional team of external vendors and Company personnel." With respect to all redaction and confidentiality-designation work performed in connection with this proceeding (including the storm invoice compilations and all other exhibits and discovery responses): (a) identify each external vendor engaged and each category of Company or ESC personnel involved (by title); (b) state the costs incurred to date and the estimated total cost, separately for vendor fees and for the allocated time of Company/ESC personnel; (c) identify the account(s) to which such costs have been or will be charged, and state whether any portion is included in, or will be sought for recovery through, the Test Year or Rate Year revenue requirement, rate case expense, or any deferral; and (d) if any such recovery is or will be sought, state the Company's legal basis for recovering such costs from ratepayers notwithstanding Conn. Gen. Stat. § 16-243p(b).

ALLCO-034 Response

(a) The Company has engaged the Technology Concepts and Design Inc. ("TCDI") Military Spouse Managed Review program and Keegan Werlin LLP to assist with redaction and confidentiality-designation work due to the volume of documentation. Additionally, the Company's internal legal counsel and project management staff are performing redaction and confidentiality-designation work.

(b) The Company does not separately track time for redaction and confidentiality designation work performed by internal resources. Keegan Werlin LLP was only recently engaged to perform high-volume redaction and confidentiality-designation services and, accordingly, has not yet invoiced the Company for those services. The Company will supplement this response with the requested information for Keegan Werlin LLP once it becomes available. TCDI has billed the Company a total of $26,990.40 for redaction work through the end of August 2026. The invoices for the TCDI work are provided as Attachment ALLCO-034, Attachment 1 CONFIDENTIAL. TCDI estimates the costs for additional redaction work in September of $5,000 or less. The Company will supplement this response with additional information, as necessary, once it becomes available.

(c) The Company is tracking the costs associated with the redaction and confidentiality-designation work and plans to seek recovery for these costs in this proceeding.

(d) The Company has been advised by legal counsel that the confidentiality-designation and redaction work does not fall within any of the enumerated classes or categories of costs that are ineligible for recovery through rates under Conn. Gen. Stat. § 16-243p(b). The Company has been further advised that the costs to perform the confidentiality-designation and redaction work are incurred to comply with legal obligations governing disclosure of public records and confidential information.