STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: APPLICATION OF THE	**:**	
CONNECTICUT LIGHT AND POWER	**:**	**DOCKET NO. 26-05-10**
COMPANY D/B/A EVERSOURCE	**:**	
ENERGY TO AMEND ITS RATE	**:**	**OCTOBER 7, 2026**
SCHEDULE		

CONSERVATION LAW FOUNDATION AND SIERRA CLUB'S THIRD SET OF INTERROGATORIES

Conservation Law Foundation ("CLF") and Sierra Club request responses from the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") to the following interrogatories in the above-captioned proceeding by October 21, 2026. If there are objections to any questions, or if providing responses to any 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.

F. Where an Interrogatory asks to provide all documents please provide all data, assumptions, schedules, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of live unlocked Microsoft Excel spreadsheet files with all cell references/links and formulae intact.

G. Each Interrogatory to provide all documents or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

H. If the Company finds any request to be ambiguous, please notify Conservation Law Foundation through their counsel so the request can be clarified prior to the preparation of a written response.

I. If information requested is not available and cannot be made available in the exact form requested, provide such information or documents as can be made available that best respond to the request.

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

Interrogatories CLF-SC-24 through CLF-SC-35 are directed to the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company").

CLF-SC-24. Refer to Exhibit CLP-IAP-1, at 70, which states that the Optional Residential Space Heating Rate (ORSHR) "is grounded in cost causation principles." Please define "cost causation principles" and explain how the ORSHR is "grounded" in each principle.

CLF-SC-25. Refer to Exhibit CLP-IAP-1, at 70, which states that "the discount reflects the terms on which heating load can be served rather than a subsidy collected from other customers." Please explain what you mean by this.

CLF-SC-26. Refer to Exhibit CLP-IAP-1, at 69, which states: "the Company has designed the rate to be priced above the marginal cost to serve those customers [who install heat pumps]." Please provide the marginal costs to serve customers who install heat pumps, broken down by component (including transmission and distribution costs). Provide any workbooks used to produce these figures, with all formulas unlocked.

CLF-SC-27. How does the Company define the marginal cost to serve customers who install heat pumps? In your response, explain: (a) whether the Company is using the absolute marginal cost to serve customers who install heat pumps, the incremental marginal cost to serve these customers, or something else; and (b) the Company's rationales for its selected approach.

CLF-SC-28. Refer to Exhibit CLP-IAP-1, at 70, which states: "The load-shape analysis that determines exactly how heat pump usage lines up against the system peak, and the allocation of the discount across the components of the bill, sit with the rate-design panel." Provide the load-shape analysis and any underlying workbooks used to produce the analysis, with all formulas unlocked.

CLF-SC-29. Refer to Exhibit CLP-IAP-1, at 70, which states: "When customers want to electrify, the rate structure should make that choice affordable, on terms that are fair to both the customers who convert and to those who do not." Provide the definition of "fair" in this context and explain how the Optional Residential Space Heating Rate promotes such fairness for customers who convert to heat pumps and those who do not.

CLF-SC-30. Refer to Exhibit CLP-IAP-1, at 69, which states: "customers that have not yet been able to transition to heat pumps will actually benefit from this rate because new incremental load from heat pumps will contribute to other fixed cost requirements." Does this create a cross-subsidy from customers who have transitioned to heat pumps to those who have not? Please explain why or why not.

CLF-SC-31. Explain whether the Optional Residential Space Heating Rate includes a seasonal discount on transmission charges for residential customers who enroll in Rate 6. If there is no such adjustment, explain why not.

CLF-SC-32. Refer to Exhibit CLP-IAP-1, at 68, which states: "The rate reflects a seasonal discount but is still set above the marginal cost to serve those customers, the expected result is that there will be more incremental load to spread the Company's fixed costs over." Does the Company agree that transmission rates for customers who have transitioned to heat pumps could be designed to "reflect a seasonal discount but is still set above the marginal cost to serve those customers," with the expected result that there would be more incremental load to spread the transmission grid's fixed costs over?

CLF-SC-33. Refer to Exhibit CLP-MCOS-1 at 12, which describes a probability of peak analysis used in the marginal cost of service study. Provide the probability of peak analysis and any underlying workbooks used to produce the analysis, with all formulas unlocked.
Please provide for each hour of the year (1) the likelihood that each hour of each day type may reach or exceed the annual peak load for each hour of the year; (2) the cost and load data used to allocate the annual marginal substation costs to hours and months at an hourly resolution; and (3) the hourly marginal costs allocated to each hour of the year.

CLF-SC-34. Refer to Exhibit CLP-IAP-1 at 70, which states that the Optional Residential Space Heating Rate "removes a large obstacle to adoption, which is the fear that heating with electricity costs more than the fuel it replaces," and the Company's response to CLF-002, which states: "The Company deliberately excluded natural gas heating conversions from Rate 6 eligibility because Rate 6 is an affordability measure . . . . For customers heating with natural gas, conversion to a heat pump typically increases the household's total energy bill at current prices." Explain how excluding natural gas heating customers from eligibility under Rate 6: (a) promotes affordability for natural gas heating customers, and (b) "removes a large obstacle to adoption, which is the fear that heating with electricity costs more than the fuel it replaces" for natural gas heating customers.

CLF-SC-35. Refer to the Company's response to CLF-003, which states: "at the system level, the rate adds incremental load priced above the marginal cost of serving it, so each incremental

kilowatt-hour contributes to recovery of the Company's cost of providing service. Spreading fixed costs over a larger sales base places downward pressure on average rates for all customers over time. This provides an economic benefit for all residential customers, not just Rate 6 participants." Isn't this even more the case for these customers under Rate 1?

CERTIFICATE OF SERVICE

This is to certify that on October 7, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served via electronic mail upon all parties designated on the Authority's official service list in the applicable proceeding in accordance with R.C.S.A. § 16-1-15.

/s/ Sarah Krame

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