**STATE OF CONNECTICUT**
**PUBLIC UTILITIES REGULATORY AUTHORITY**

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| **RE:** | **APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES** | **:** | **DOCKET NO. 26-05-10** |
| | | **:** | **SEPTEMBER 22, 2026** |

# THE OFFICE OF CONSUMER COUNSEL'S TWENTIETH 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 **October 6, 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-814 through OCC-860 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):**

OCC-814. Bank. Fees. Refer to the response to OCC-368. Provide the subcategories of bank fees and debt service charges (including but not limited to New York Stock Exchange fees, proxy solicitor fees, annual report and proxy printing costs, transfer agent fees, Broadbridge, quarterly subscription fees, security position reports, etc.)

OCC-815. Uncollectibles. Refer to WP C-3.30.

a. Explain why the uncollectible expense is calculated including the revenues and uncollectibles for the RAMs and not just distribution revenues.
b. Update the schedule to provide the information on a distribution only basis.
c. Identify each RAM that recovers uncollectible expense.

OCC-816. Uncollectible Expense. Refer to Schedule C-3.0.

a. Explain the reason for the significant increase in uncollectible expense in 2024 and 2025 over the prior year amounts and why this level is expected to continue in the rate year.
b. Explain the company's efforts to reduce base distribution uncollectibles.

OCC-817. Long Term Director Stock. Refer to the response to OCC-041. Provide the amount of long term director stock expense included for recovery in the rate year.

OCC-818. Frontier Reimbursements. Does the Company bill Frontier for blue sky vegetation management work? If not, explain why not. If so, provide the amounts billed and the amounts collected for blue sky work for each year 2021, 2022, 2023, 2024, 2025, as well as the amounts included in the test year and rate year.

OCC-819. Robotic Process Automation Cost Savings. Refer to the response to EOE-029. Did the implementation of the Robotic Process Automation reduce base distribution labor as it automated a time consuming process? If so, please quantify the savings reflected in the rate year and the specific schedules where the savings are reflected. If not, explain why not.

OCC-820. Drone Costs. Refer to the response to EOE-033.
a. Provide an explanation of the Creative Surveying Cost in 2025 and 2026.
b. Explain the large increase in this cost in 2025 and 2026 over the prior years.
c. State whether this cost is included in base rates or in the storm docket. If it is in base rates provide the amount included in the rate year and the revenue requirement schedule where it is located and explain why this expense is expected to occur annually.

OCC-821. Inflation. Provide a list of all accounts in the rate year where the Company simply applied inflation in deriving the rate year amount, and the annual expense for each year 2021, 2022, 2023, 2024, 2025, the test year and the amount included in the rate year.

OCC-822. Mutual Aid Billed to Other Utilities. Refer to the response to EOE-039. Explain where and how the amounts CL&P receives for assisting other non-affiliate utilities are reflected in base distribution rates. If they are not reflected in base rates, explain how the company accounts for them on its books.

OCC-823. Loyalty Credits. Refer to the response to RRU-006 Attachment 2.
a. Provide the calculations showing how the rate year amount was derived.
b. Provide the loyalty credits for each of the years 2021, 2022, 2023, 2024 and 2025.
c. Explain why loyalty credits are not escalated as stated in footnote (a).

OCC-824. Injuries and Damages. Refer to the response to OCC-303.
a. Provide the rate year amount of public liability injuries and damages expense included in the rate year including supporting calculations.
b. Explain the reasons for the year-over-year variances for the public liability expense.
c. Explain the types of claims included in the public liability expense.

d. Explain the reasons for the year-over-year increase for workers compensation expense.

OCC-825. Public Liability Reserve. Refer to the response to OCC-308. Explain the reason for the large increase in the reserve accrual in 2022 and 2023 over the other years shown.

OCC-826. Property Tax Refunds.

a. Does the Company challenge property tax assessments? If so, explain how the company decides to challenge the assessments and how often they are challenged. If not, explain why not.
b. Provide the annual property tax refunds received in each year 2021, 2022, 2023, 2024, 2025, the test year and reflected in the rate year. If none are reflected in the rate year explain why not.
c. Did the Company receive any property tax abatements in 2021, 2022, 2023, 2024, 2025, and 2026? If so explain and explain how they are reflected in the rate year.

OCC-827. Outside services. Refer to the response to OCC-315. Provide the amount of outside services reflected in the rate year as originally requested.

OCC-828. Other revenues. Refer to the response to OCC-316 Attachment 1.

a. Provide a brief description of each type of revenue.
b. For each revenue that the company forecasted to remain flat in the rate year, explain why.
c. Provide the reason for the decrease in returned check fees and late payment charges in 2025 over the 2024 level.

OCC-829. Overtime Payroll. Refer to the response to OCC-318. Explain the reason for the increased overtime in 2025 over the prior years.

OCC-830. Payroll Expense. Refer to Schedule C-3.0, line 21 and Schedule C-3.5. Explain in detail the reason for the $15.138 million increase in payroll expense in the rate year over the 2025 level.

OCC-831. Payroll. Refer to the responses to OCC-326 Attachment 1 and OCC-333. Are any of the new positions being requested also on the list of open positions or similar to the ones listed in the open positions? If so, identify and describe each.

OCC-832. Payroll. Refer to the response to OCC-327.

a. Does the company typically fill open positions from within the company?
b. Does the company prefer to fill positions within the company?
c. Approximately how long does it take the company to fill a position once it begins recruiting?

OCC-833. Payroll. Refer to the response to OCC-333.

a. Provide the total cost included in the rate year associated with the 58 new FTEs broken down by payroll, benefits, payroll taxes.
b. Provide the rate year amount associated with the 41 new FTEs broken down by payroll, benefits, payroll taxes.

OCC-834. Overtime Payroll. Refer to the response to OCC-318.

a. Provide the actual overtime expense for each of the years shown.
b. Explain why the company budgets overtime expense annually but not for the rate year.

OCC-835. Payroll. Refer to the response to OCC-333 which states that of the 41 new positions requested, 21 vegetation management, 5 power quality positions and 2 distribution planning and forecasting positions are contingent on PURA's approval in this case. If they are contingent on PURA's approval, explain how these positions are necessary.

OCC-836. Payroll. Refer to the response to OCC-357(b). Identify the last time the company made organizational changes that resulted in reducing its employee count and/or curtailing other expenses and capital spending.

OCC-837. Service Company Payroll. Refer to the response to OCC-332. Provide the service company payroll charged to CL&P broken out by expense and capital in each year 2021, 2022, 2023, 2024, 2025, the test year and the rate year.

OCC-838. CL&P Payroll. Refer to the response to OCC-332 which states in a normal year it is expected CL&P employees will charge 100% of their time to CL&P.

a. State whether 2025 was a normal year and whether CL&P employees charged 100% of their time to CL&P.

b. Provide the last non-normal year where CL&P employees did not charge 100% of their time to CL&P.

OCC-839. Field Operations Expense (Overhead Lines Operations & Maintenance). Refer to Schedule C-3.0 line 32 and Schedule C-3.16. Explain in detail the reason for the $3.433 million increase in expense in the rate year over the 2025 level. Provide documentation supporting the increase (quotes, invoices, contracts)

OCC-840. O&M expenses. Refer to the response to OCC-375(f) Explain in detail what the "optimization of O&M" throughout Connecticut Operations" refers to.

OCC-841. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-04)(MS24E), p. 8-44. These invoices contain repeated references to removing dead trees a week or more after the dates of event MS24E, but do not indicate the dead tree was affecting the line (and power had been restored). Please provide all written guidance governing and explain all rationale regarding assigning the costs of this work to MS24E rather than routine vegetation management.

OCC-842. (STORM) a. Does the Company limit vegetation management work performed after storms solely to work caused by the storm? b. If yes to a, please describe how the Company verifies that all trees cut by the vegetation management company had storm damage (for example, if a tree was touching the line, how does the Company verify if this was caused by storm damage or growth?).

OCC-843. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-04)(MS24E), p. 54-63. Did the Company receive completed and/or attached Emergency Restoration Tree

Contractor Work Location forms for these timesheets? If so, please provide. If no, please explain how the Company validated these invoices.

OCC-844. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-04)(MS24E), p. 95-100. Did these crews perform work at any site or were they on standby at the Torrington Work Center on March 11 and 12? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-845. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-05)(MS24E), p. 4-14. Did the Company receive completed and/or attached Emergency Restoration Tree Contractor Work Location forms for these timesheets? If so, please provide. If no, please explain how the Company validated these invoices.

OCC-846. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-05)(MS24E), p. 27-30. Did this crew perform work at any site or were they on standby at the Newtown Work Center on March 11 and 12? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-847. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-05)(MS24E), p. 34-36. Did this crew perform work at any site or were they on standby at the Newtown Work Center on March 11 and 12? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-848. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-05)(MS24E), p. 90-92. Did this crew perform work at any site or were they on standby at the Work Center on March 11 and March 13? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-849. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-06)(MS24E), p. 1-6. Did these crews perform work at any site or were they on standby at the Cheshire Work Center on March 11 and March 12? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-850. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-06)(MS24E), p.13-18. Did these crews perform work at any site or were they on standby at the Cheshire Work Center on March 11 and March 12? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-851. (STORM) For each claimed storm event, perform an IEEE 1366 Major Event Day analysis and identify whether the storm would qualify as a MED based on daily SAIDI.

OCC-852. (STORM) Identify each storm that exceeded the dollar threshold but did not qualify as an IEEE 1366 MED, and explain why extraordinary recovery is still appropriate.

OCC-853. (STORM) Explain whether Eversource has any after-action process to determine whether pre-staging was excessive, and whether any costs have ever been excluded from storm recovery because forecasted impacts did not materialize.

OCC-854. (Environmental Remediation) Per a footnote in Settlement Agreement Attachment 3, in Docket Number 17-10–46, the Company was allowed $2.289 million for

environmental O&M expenses in Rate Year 1, $2.381 million in Rate Year 2, and $2.467 million in Rate Year 3.

a. Were the O&M expenses incurred in the prior rate plan's rate years of a similar nature to the $1.93 million requested in the current rate application? Explain.

b. Were there any environmental remediation costs being deferred prior to the time of the last rate case?

c. If yes, indicate the amounts deferred annually.

d. Were there any deferred environmental remediation costs being amortized or recovered prior to the time of the last rate case?

e. Were there any deferred environmental remediation costs being amortized/recovered and as a result of the approved settlement agreement in Docket No. 17-10-46?

f. If yes, indicate the amounts amortized or recovered annually.

OCC-855. (Environmental Remediation) Refer to the Direct Testimony of Marc J. Richards, Gary A. Iadarola and Claire B. Connolly, Exhibit CLP-ENV-1, p. 24. Was the 50/50 cost sharing agreement with Yankee Gas for Site #9, Winsted Former MGP, approved by the Authority? Provide cites to the request made by the companies and decisions and rulings from the Authority approving the treatment of costs.

OCC-856. (Environmental Remediation) Refer to Exhibit CLP-ENV-5. In estimating 2026-2028 environmental remediation costs, the Company utilized a 30% contingency factor. Please provide prior precedent where the Authority has allowed the recovery of forecasted costs that included escalation for a contingency factor. Indicate how a contingency factor meets the "known and measurable" standard.

OCC-857. (Capital Support Mechanism) On p. 101 of Exhibit CLP-ELP-1, the Company states that, “As part of the Company’s annual RAM compliance filing, actual plant additions placed in service during the applicable plan year will be reconciled against the approved forecast.” In the Company’s response to EOE-156, Witness Horton states that prudence reviews would be included in the annual reconciliation process.

a. Provide a detailed plan for how the Company envisions the annual reconciliation process would proceed and how long the process would take both as a whole, and for each step. Please identify what filings would be made, whether and how discovery would be allowed, and what types of determinations would be required by the Authority.

b. Where in the reconciliation process will the distinction and differences be identified between realized annual plant addition costs and the associated rate base, and the return, taxes, and deprecation on rate base that are included in the going-in revenues?

c. Will the annual PBR reconciliations be assessments of the whole Company's rate base with calculations of commensurate return, tax and depreciation, or will it be an incremental adjustment based on annual plant additions? Please explain.
d. Provide one or more examples, as appropriate, showing how the annual capital recovery process, including reconciliation, would function, including detailed calculations in the form to be used in the annual adjustment filings.
e. Provide a list of all types of costs that will be included in the capital recovery reconciliations.

OCC-858. Refer to Exhibit CLP-ELP-1, figure 7. Please explain whether the amounts shown in Figure 7 are capital expenditures versus plant additions. Please explain any differences in the nature, or timing of the amounts shown in Figure 7 and the amounts of plant addition that would be used in comparing [i.e., determining "lessor of"] annual plant addition costs in the annual reconciliation filings.
a. Please identify, in disaggregated table form, all of the component costs included in each category of the amounts shown in Figure 7.

OCC-859. (Capital support mechanism) PURA defined six calculation steps for the CT-Bar as outlined in the 2021-05-15RE01 Proposed Final Decision. Compare the Company's proposed F-factor with each of the six steps of the CT-Bar calculation methodology, indicating where and when the proposed step has or will occur in the Company's approach to the present proceeding. For each of the six CT-Bar calculation steps, explicitly name the different approach that the Company plans to employ in calculating going-in rates and the proposed F-Factor. In the response, specifically include the following:
a. Identify when and how the amount of total depreciation expense associated with capital projects placed in service as of the end of the evidentiary record will be included in going-in rates (i.e., step 3);
b. Identify when and how the forecasted capital additions will be reduced by the value of the depreciation expense in Step 3; and,
c. Identify all CT-Bar calculation steps that are absent from or inconsistent with the Company's proposed F-factor approach.

OCC-860. Does the Company have clear protocols for allocating Company labor and labor overheads to capitalized projects?
a. Are these protocols in written form? If so, please provide. If not please explain protocols and methods in detail.
b. Are these protocols implemented as part of monthly or regular periodic accounting, or are these determinations only made in preparation for determination of revenue requirements as in the context of a general rate case?
c. How would capitalization of labor and labor overheads be determined and documented within the annual reconciliation proceeding?

d. Please provide an example of the calculation of expensing versus capitalization of labor-related costs that would be filed in an annual reconciliation filing.
e. How did the protocols apply to how the Company quantified test year expenditures in this proceeding?
f. Have the Company's standards or protocols changed over time? For example, is the Company's approach in this rate case different to any other rate case? If yes, explain when, why, and how the protocols or standards have changed.

Respectfully submitted,

**STATE OF CONNECTICUT**
**OFFICE OF CONSUMER COUNSEL**

**CLAIRE E. COLEMAN**
**CONSUMER COUNSEL**

By: /s/ Kimberly White

Kimberly White
Staff Attorney
10 Franklin Square
New Britain, CT 06051
860.827.2695

**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 New Britain, Connecticut this 22nd day of September, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court