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 7, 2026**

THE OFFICE OF CONSUMER COUNSEL'S THIRD 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 **August 21, 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-192 through OCC-253 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-192. (CORPORATE STRUCTURE)

a. Please provide an organizational chart showing the Eversource organizational structure (including all operating companies, etc…).
b. Please provide an organizational chart for CL&P, showing all employee positions and their entire chains of command.

OCC-193. (COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1, p. 7, where the Company states its employees are compensated "competitively in comparison to compensation paid by other employers in the energy/utility and general industry sectors."

a. Please provide all studies and/or research the Company has conducted or has caused to be conducted from 2018 to the present indicating the compensation paid by other employers in the energy/utility and general industry sectors.
b. Please provide all studies and/or research informing the Company's compensation structure for its employees.

OCC-194. (UNION AGREEMENT) Please refer to Exhibit CLP-EMPLOYEE-1 p. 15-18. Please provide copies of all union agreements in effect between January 1, 2018, through the present, including all addendums and/or exhibits indicating compensation rates.

OCC-195. (COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1. Please provide the source material used to create Tables 3 through 7.

OCC-196. (VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, p. 32, Table 8. Please explain in detail each of the metrics, including the components of the "Enhance the Customer Experience" and "Clean Energy Execution" metrics, and how each was met to earn variable pay.

OCC-197. (VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, p. 32, Table 8. One of the metrics includes "execution of Massachusetts Grid Modernization." Please explain how this assisted Connecticut customers.

OCC-198. (VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, Table 8. Please provide the data in Table 8 for each year from 2018 through 2023, including a separate table for each year.

OCC-199. (COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1. Please indicate from 2018 to the present how employee compensation (base pay, variable pay, and benefits) has been divided among the Company's operating companies for employees performing tasks for multiple companies, specifically indicating how Eversource ensures that employees performing work for multiple companies have their compensation allocated appropriately.

OCC-200. (PAY INCREASES) Please provide the base salary increases (by percentage and dollar amount) for non-union employees and executives for each year from 2018 to the present.

OCC-201. (VARIABLE PAY) Please provide the data in Exhibit-CLP-EMPLOYEE-3 for each year from 2018 through 2024, separated by year.

OCC-202. (COMPENSATION) Please provide an unlocked Excel spreadsheet, showing in individual tabs for each year from 2018 through the present each Company employee and executive's pay, separated into base pay, variable pay, benefits, any other compensation provided to the employee (e.g., stocks, options, etc…), the total all-in pay for that year, and the percentage allocated to CL&P customers. This exhibit may include job titles rather than employee names, but please number each position to allow the individual in the position to be tracked across all years.

OCC-203. (EMPLOYEE HEALTH INSURANCE) Please refer to Exhibit CLP-EMPLOYEE-1, p. 65. Does the Company permit employee family members to enroll as part of the employee's health insurance if the family member has alternate health insurance coverage (e.g., the employee's spouse has coverage from their employer)?

OCC-204. (BENEFITS) Please refer to Exhibit CLP-EMPLOYEE-1.

a. Does the Company offer any employee benefits not discussed in the testimony (e.g., dependent care benefits, pet care, pet insurance, etc…)? If yes, please describe all benefits.
b. Please provide on unlocked Excel spreadsheet showing on an annual basis from 2018 to the present the total cost associated with each employee benefit (e.g., health insurance, dental insurance, vision insurance, retirement savings, etc…).

OCC-205. (MEDICAL INSURANCE COSTS) Please refer to Exhibit CLP-EMPLOYEE-1, Table 13. Has the Company identified a cause for the general downward trend in medical insurance costs from 2017 through 2023 and the significantly upward trend from 2023 through 2026? If yes, please explain.

OCC-206. (EMPLOYEE GOALS) Please refer to Exhibit CLP-EMPLOYEE-4B.

a. Please confirm that each of the employees listed was compensated by CL&P and the Company is seeking recovery of their compensation from CL&P customers.
b. If yes to (a), please explain how each of the tasks/goals listed benefited CL&P customers. (e.g., how did preparing for the Aquarion rate case benefit CL&P customers?)

OCC-207. (IOWA Curve-ACCT 370.50) Referring to Exhibit CLP-Depreciation-3, pages 130-131. How did the Company determine an IOWA 10-S3 curve is appropriate

curve if FERC Account 370.50 Electric Vehicle Charging Station had no retirements.

OCC-208. (IOWA Curve-ACCT 371.00) Referring to Exhibit CLP-Depreciation-3, page 132. What is FERC Account 371.00 "Installations on Customers' Premises" and provide examples of the assets?

OCC-209. (IOWA Curve-ACCT 371.00) Referring to Exhibit CLP-Depreciation-3, page 132. Provide an IOWA 30-L0 on the graph in red.

OCC-210. (IOWA Curve-ACCT 371.00) Referring to Exhibit CLP-Depreciation-3, page 132. Provide an IOWA 20-L2 on the graph in blue.

OCC-211. (IOWA Curve-ACCT 373.00) Referring to Exhibit CLP Depreciation-3, page 141. Provide an IOWA 22-L0 on the graph in red.

OCC-212. (IOWA Curve-ACCT 390.10) Referring to Exhibit CLP Depreciation-3, page 148. Provide an IOWA 50-R1.0 on the graph in red.

OCC-213. (IOWA Curve-ACCT 392.10) Referring to Exhibit CLP Depreciation-3, page 155. Provide examples of what FERC Account 392.10 Transportation Equipment – Class 1 (CARS) the company would utilize.

OCC-214. (IOWA Curve-ACCT 392.10) Referring to Exhibit CLP Depreciation-3, page 155. Provide an IOWA 10-L3 on the graph in red.

OCC-215. (IOWA Curve-ACCT 392.13) Referring to Exhibit CLP Depreciation-3, page 161. Provide an IOWA 10-S1.0 on the graph in red.

OCC-216. (IOWA Curve-ACCT 392.14) Referring to Exhibit CLP Depreciation-3, page 163. Provide an IOWA 14-S3 on the graph in red.

OCC-217. (IOWA Curve-ACCT 392.14) Referring to Exhibit CLP Depreciation-3, page 163. Provide an IOWA 12-S2 on the graph in blue.

OCC-218. (Statistics Depreciation) Referring to Exhibit CLP Depreciation-3, page 173. What computer programs did the Company run or analyze net salvage statistics on?

OCC-219. (Cost of Removal) Referring to Exhibit CLP Depreciation-3, page 178, Year 2023, "Cost of Removal Amount" column, number 13,097,695. Provide support for the number "13,097,695".

OCC-220. (Net Salvage Percent) Referring to Exhibit CLP Depreciation-3, page 219. How did the Company determine the Net Salvage Percent as 0?

OCC-221. (Net Salvage Percent) Referring to Exhibit CLP Depreciation-3, page 220. How did the Company determine the Net Salvage Percent as –100?

OCC-222. (Survivor Curve Changes) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 364.00, Distribution Plant "POLES, TOWERS AND FIXTURES". What caused the company to propose a decreased survivor curve of 48-R0.5 compared to current survivor curve 53-R0.5?

OCC-223. (IOWA Curve-ACCT 364.00-Current) Referring to Exhibit CLP-Depreciation-3, pages 82. Provide an IOWA 53-R0.5 on the graph in purple.

OCC-224. (Net Salvage Percent) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 364.00, Distribution Plant "POLES, TOWERS AND FIXTURES". What caused the Company to decrease net salvage percent from (90) to (100)?

OCC-225. (Accrual Amount – Column 10 Calc) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 363.32, Distribution Plant "COMMUNICATION EQUIPMENT - MICROWAVE". How did the Company calculate an Accrual amount of 98,066 in column 10?

OCC-226. (Land Rights) Referring to Exhibit CLP Depreciation-4, page 1. FERC Accounts 360.20 and 389.20. Why are land rights considered depreciable plant and nondepreciable plant?

OCC-227. (FERC ACCT 390.20) Why is Structures and Improvements – Simsbury considered nondepreciable plant?

OCC-228. (IOWA Curve-ACCT 362.00-Current) Referring to Exhibit CLP-Depreciation-3, page 67. Provide an IOWA 60-S0 on the graph in purple.

OCC-229. (IOWA Curve-ACCT 365.00-Current) Referring to Exhibit CLP=Depreciation-3, page 89. Provide an IOWA 52-R0.5 on the graph in purple.

OCC-230. (IOWA Curve-ACCT 366.00-Current) Referring to Exhibit CLP-Depreciation-3, page 96. Provide an IOWA 75-R2 on the graph in purple.

OCC-231. (IOWA Curve-ACCT 367.00-Current) Referring to Exhibit CLP-Depreciation-3, page 103. Provide an IOWA 53-R0.5 on the graph in purple.

OCC-232. (IOWA Curve-ACCT 370.47-Current) Referring to Exhibit CLP-Depreciation-3, page 124. Provide a purple IOWA 23-L1 on a graph containing only FERC ACCT 370.47 placements in black.

OCC-233. (IOWA Curve-ACCT 370.48-Current) Referring to Exhibit CLP-Depreciation-3, page 124. Provide a purple IOWA 23-L1 on a graph containing only FERC ACCT 370.48 placements in black.

OCC-234. (Life Span Method) Referring to Exhibit CLP-Depreciation-3, page 124 and Exhibit CLP Depreciation-4, page 2. Why did the Company use the life span method instead of an IOWA curve?

OCC-235. (IOWA Curve-ACCT 370.48-Current) Referring to Exhibit CLP-Depreciation-3, page 128. Provide an IOWA 23-L1 on the graph in purple.

OCC-236. (IOWA Curve-ACCT 373.00-Current) Referring to Exhibit CLP-Depreciation-3, page 141. Provide an IOWA 25-L0 on the graph in purple.

OCC-237. (IOWA Curve-ACCT 392.10-Current) Referring to Exhibit CLP-Depreciation-3, page 155. Provide an IOWA 7-L2.5 on the graph in purple.

OCC-238. (IOWA Curve-ACCT 392.11-Current) Referring to Exhibit CLP-Depreciation-3, page 157. Provide an IOWA 10-S2 on the graph in purple.

OCC-239. (IOWA Curve-ACCT 392.12-Current) Referring to Exhibit CLP-Depreciation-3, page 159. Provide an IOWA 12-S2 on the graph in purple.

OCC-240. (IOWA Curve-ACCT 392.13-Current) Referring to Exhibit CLP-Depreciation-3, page 161. Provide an IOWA 14-S1.5 on the graph in purple.

OCC-241. (IOWA Curve-ACCT 392.14-Current) Referring to Exhibit CLP-Depreciation-3, page 163. Provide an IOWA 12-S2.5 on the graph in purple.

OCC-242. (IOWA Curve-ACCT 392.15-Current) Referring to Exhibit CLP-Depreciation-3, page 165. Provide an IOWA 20-L2 on the graph in purple.

OCC-243. (IOWA Curve-ACCT 392.89-Current) Referring to Exhibit CLP-Depreciation-3, page 168. Provide an IOWA 25-S3 on the graph in purple.

OCC-244. (VMP) Referring to Exhibit CLP-VMP-1, page 7. Provide support for the claim hazard trees are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year.

OCC-245. (VMP) Referring to Exhibit CLP-VMP-1, page 8. Provide support for the claim Company has experienced declining tree health in Connecticut over the past several years.

OCC-246. (VMP) Referring to Exhibit CLP-VMP-1, page 8. Give a list of actual examples for persistent number of trimming refusals, modifications and non-responses in relation to the Company's trimming notifications.

OCC-247. (VMP) Referring to Exhibit CLP-VMP-1, page 8. Provide support for the claim the Company has experienced increased severity and frequency of strong weather systems as compared to the storm impact over the last 26 years.

OCC-248. (VMP) Referring to Exhibit CLP-VMP-1, page 8. What does the Company consider a strong weather system is?

OCC-249. (VMP) Referring to Exhibit CLP-VMP-1, page 9. How does the Company measure wind "turbulence" and "torque" impact on trees?

OCC-250. (VMP) Referring to Exhibit CLP-VMP-1, page 9. Provide an Excel spreadsheet with an entire list of storms from 2021 through 2025 with each storm's maximum and average wind turbulence by area work center location.

OCC-251. (VMP) Referring to Exhibit CLP-VMP-1, page 9. Do the Company's internal employees measure wind turbulence or torque impact on trees?

OCC-252. (VMP) Referring to Exhibit CLP-VMP-1, page 9. Does the Company utilize external contractors to measure wind turbulence or torque impact on trees?

OCC-253. (VMP-Branches) Referring to Exhibit CLP-VMP-1, page 7 and 9. Based on the Company's statement that hazard trees cause 76% of customer outages:

a. Please provide all research and/or justification for focusing on trimming branches that are encroaching into conductors and removing overhanging branches.
b. Would a greater focus on hazard trees instead of trimming branches produce better grid reliability? Please provide all research the Company has conducted on this subject.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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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 7th day of August, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court