STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**DOCKET NO. 26-05-10**
	:	**October 29, 2026**

CONNECTICUT INDUSTRIAL ENERGY CONSUMERS
FIRST SET OF INTERROGATORIES

The Connecticut Industrial Energy Consumers ("CIEC") requests responses from The Conservation Law Foundation and Sierra Club ("CLF-SC") to the following interrogatories in the above-captioned proceeding by **November 12, 2026**. If there are any objections to any questions, or if providing responses to certain 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.

DEFINITIONS

A. "Velez Direct Testimony" means the Direct Testimony of Juan-Pablo Velez on behalf of CLF-SC in this proceeding dated October 21, 2026. Page and line citations to Velez Direct Testimony refer to the printed page numbers and line numbers of that testimony.

B. "CL&P" or "Company" means The Connecticut Light and Power Company d/b/a Eversource Energy.

C. "Rate HP" means the heat pump rate schedule proposed in Velez Direct Testimony. "Rate 1" means the Company's standard residential rate schedule. "T&D" means transmission and distribution. "Overpayment" and "overcharge" have the meanings Mr. Velez gives those terms in Velez Direct Testimony.

D. "Existing heat pump customer" means a Company residential customer that installed a heat pump before Rate HP would take effect, whom Mr. Velez recommends be automatically enrolled in Rate HP (Velez Direct Testimony at page 7, lines 7-8, and page 93, lines 7-12).

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

The following interrogatories are directed to Witness Juan-Pablo Velez:

CIEC-1. Please refer to Velez Direct Testimony at page 6, lines 11-23; page 7, lines 1-12; and page 81, lines 10-16.

a. Please provide Mr. Velez's estimate of the total annual reduction in (i) distribution revenue and (ii) transmission revenue that the Company would collect under Rate HP, relative to Rate 1, for each of the first five years after Rate HP takes effect. Provide all workpapers in Excel format with formulas intact.

b. Please provide Mr. Velez's estimate of the number of existing heat pump customers who would be automatically enrolled in Rate HP, and identify the source of that estimate.

c. Please provide Mr. Velez's estimate of the number of customers who would be newly enrolled in Rate HP in each of the first five years after it takes effect, and identify all assumptions used.

d. If Mr. Velez has not prepared the estimates requested in parts (a) through (c), please explain why not.

CIEC-2. Please refer to Velez Direct Testimony at page 95, lines 1-16, and page 98, lines 10-18.

a. Please confirm that Rate HP is not designed to be revenue neutral with respect to the residential class as a whole.

b. Please identify who Mr. Velez contends should bear any reduction in distribution and transmission revenue resulting from Rate HP (*e.g.*, other residential customers, non-residential customers, or the Company's shareholders), and explain the basis for that position.

c. Does Mr. Velez recommend that any portion of the revenue reduction resulting from Rate HP be recovered from customers outside the residential

class? If so, identify each class and the amount. If not, explain how his recommendations would prevent that result.

d. In developing his recommendations, did Mr. Velez consider how any revenue reduction resulting from Rate HP would be recovered between rate cases through the Company's reconciling mechanisms? If so, describe that consideration and provide any analysis. If not, explain why not.

CIEC-3. Please refer to Velez Direct Testimony at page 83, footnote 75, and page 101, lines 5-17.

a. Please explain why Mr. Velez did not propose a revenue-neutral seasonal design under which the winter reductions in Rate HP would be offset by higher summer distribution and transmission rates.

b. Would Mr. Velez object to a requirement that any revenue reduction resulting from Rate HP be recovered solely from the residential class? If so, explain why.

c. If any revenue reduction resulting from Rate HP were recovered solely from the residential class, please provide Mr. Velez's estimate of the resulting increase in Rate 1 distribution and transmission charges, with supporting workpapers.

CIEC-4. Please refer to Velez Direct Testimony at page 9, lines 1-7; page 17, lines 1-6; and page 18, lines 3-6.

a. Please confirm that, based on the figures in Velez Direct Testimony, the average fossil fuel-heated customer pays approximately $1,178 per year in distribution and transmission charges ($814 + $364) before installing a heat pump, while causing approximately $123 per year in marginal T&D costs.

b. Please explain why, under Mr. Velez's methodology, the difference of approximately $1,055 per year between those two amounts is not also an "overcharge" or "overpayment."

c. Please confirm that this difference represents the customer's contribution to the recovery of the embedded costs of the Company's existing transmission and distribution facilities. If Mr. Velez does not agree, explain what that difference represents.

CIEC-5. Please refer to Velez Direct Testimony at page 13, lines 18-23, and page 14, lines 1-11.

a. Mr. Velez states that existing T&D infrastructure "does need to be paid for." Please explain how, under the cost causation framework in Velez Direct Testimony, the embedded costs of existing T&D infrastructure should be recovered and from whom.

b. If the incremental usage of a customer is priced at marginal T&D cost, as Mr. Velez proposes for heat pump load, please identify which customers would pay the embedded T&D costs that the incremental usage no longer contributes to.

c. Does Mr. Velez contend that the incremental load of commercial and industrial customers should likewise be priced at marginal T&D cost? Explain why or why not.

CIEC-6. Please refer to Velez Direct Testimony at page 27, lines 3-8.

a. Please provide all analysis supporting the statement that the Company could eliminate the entire overpayment "without negatively affecting the bills of non-heat-pump customers."

b. Please explain how that statement is consistent with recovery of the Company's authorized revenue requirement between rate cases if revenue from heat pump customers is reduced.

c. Please provide Mr. Velez's estimate of the bill impact of Rate HP on (i) residential customers who do not take service under Rate HP and (ii) non-residential customers, including those taking service under Rate 39 and Rate 57.

CIEC-7. Please refer to Velez Direct Testimony at page 15, lines 5-10; page 16, lines 1-5; and page 62, lines 11-14.

a. Please explain why Mr. Velez estimated marginal transmission cost using an avoided Pool Transmission Facility cost and the probability of the New England system peak, rather than the method by which regional and local network transmission costs are actually allocated to the Company.

b. Please describe Mr. Velez's understanding of how ISO New England Inc. allocates regional network transmission service costs to the Company, including whether that allocation depends on the Company's load at the time of the peak in each month.

c. Has Mr. Velez estimated the effect of heat pump adoption on the Company's monthly peak loads during November through March, or on the transmission costs allocated to the Company? If so, provide the analysis. If not, explain why not.

d. Please explain how the 75% reduction in the winter Transmission Service Rate under Rate HP would affect the Company's recovery of its transmission costs, and identify who would pay any resulting under-recovery.

CIEC-8. Please refer to Velez Direct Testimony at page 83, lines 3-16, and page 84, lines 1-12 and footnote 76.

a. Please explain Mr. Velez's understanding of the basis for the difference between the Rate 5 and Rate 1 Transmission Service Rates, and state whether he contends that difference reflects marginal transmission cost.

b. Please explain Mr. Velez's understanding of whether the winter transmission charges in the Massachusetts heat pump rates he describes were designed to recover a winter transmission revenue requirement or were instead set at an estimate of marginal transmission cost.

c. Please identify any jurisdiction of which Mr. Velez is aware that has set the retail transmission charges for a heat pump rate at an estimate of marginal transmission cost, and provide a copy of the relevant decision or tariff.

d. For each Massachusetts heat pump rate Mr. Velez describes, please explain his understanding of how any reduction in distribution or transmission revenue resulting from the rate is recovered, including whether any portion is recovered from non-residential customers.

CIEC-9. Please refer to Velez Direct Testimony at page 7, lines 9-12; page 20, lines 9-12; page 22, lines 6-14; and page 59, footnote 63.

a. In footnote 63, Mr. Velez states that "a kWh consumed during a winter peak hour imposes far higher upstream distribution costs than a kWh consumed on a mild spring afternoon." Please identify the winter peak hours to which this statement refers and explain how Rate HP's winter distribution rate reflects them.

b. Has Mr. Velez analyzed the level of heat pump adoption at which the Company's distribution system, or individual substations or feeders, would become winter peaking? If so, provide the analysis. If not, explain why not.

c. Please describe the specific process and timing Mr. Velez recommends for recalibrating Rate HP, and state whether he would support a requirement that Rate HP be recalibrated, or automatically expire, if winter loads begin to drive distribution capacity investment.

CIEC-10. Please refer to Velez Direct Testimony at page 10, footnote 4; page 19, lines 4-8; and page 20, lines 5-8.

a. Footnote 4 states that the heat pumps modeled include "electric resistance backup." Please provide the modeled hourly electric resistance backup load for the average fossil fuel-heated home after heat pump installation, and identify the hours of highest heat pump and backup load in the modeled year.

b. Please explain how the incremental marginal T&D cost of $10 per year reflects heat pump and electric resistance backup load during extreme cold weather conditions more severe than those in the modeled weather year.

c. Please provide the hourly calculation underlying the $10 per year estimate in Excel format with formulas intact.

CIEC-11. Please refer to Velez Direct Testimony at page 8, lines 1-2 and footnote 1, and page 10, lines 4-7.

a. Please describe any steps Mr. Velez took to validate or calibrate the ResStock simulated load profiles against the Company's actual residential loads, and provide the results.

b. Please provide a comparison of the simulated average annual and monthly usage of the modeled homes before heat pump installation with the Company's actual average residential usage.

c. Please provide all CAIRO model input and output files used in Velez Direct Testimony that have not already been provided in Exhibits JPV-3 and JPV-4 or in response to CIEC-1.

CIEC-12. Please refer to Velez Direct Testimony at page 7, lines 3-8; page 93, lines 7-12; and page 96, lines 1-12.

a. Does Mr. Velez agree that the load of existing heat pump customers is already on the Company's system and reflected in the sales used to set the Company's rates in this proceeding? If not, explain why not.

b. Please identify any new load, or any reduction in the Company's costs, that would result from enrolling existing heat pump customers in Rate HP.

c. Please provide Mr. Velez's estimate of the annual reduction in distribution and transmission revenue attributable solely to the automatic enrollment of existing heat pump customers.

d. Please explain how the "pre-heat-pump T&D bill" referenced at page 85, lines 5-7 would be determined for an existing heat pump customer.

CIEC-13. Please refer to Velez Direct Testimony at page 7, lines 3-6, and page 93, lines 1-6.

a. Please describe how Mr. Velez proposes that the Company verify that a customer enrolled in Rate HP has installed a heat pump and uses it as the customer's primary source of space heating.

b. Would customers that use a heat pump only as a supplemental heating source, while retaining a fossil fuel heating system, be eligible for Rate HP? Explain.

c. Would customers that heat with electric resistance, or that install ground-source heat pumps, be eligible for Rate HP? Explain.

d. Under Rate HP, would winter usage from end uses other than space heating, such as electric vehicle charging, receive the reduced winter rates? If so, please estimate the associated revenue reduction and explain why that result is consistent with cost causation.

CIEC-14. Please refer to Velez Direct Testimony at page 85, lines 1-19.

a. Please provide the derivation of the 71% winter distribution reduction and the 75% winter transmission reduction, including all inputs and calculations, in Excel format with formulas intact, to the extent not already provided in Exhibit JPV-4 or in response to CIEC-1.

b. Please identify each element of the winter distribution and transmission rates (including any reconciling or rider components) to which the 71% and 75% reductions would apply.

c. Please provide the resulting Rate HP winter rates in cents per kWh for each component.

CIEC-15. Please refer to Velez Direct Testimony at page 97, lines 3-13, and page 98, lines 1-18.

a. Please provide the derivation of the $121.49 monthly customer charge, in Excel format with formulas intact, to the extent not already provided in Exhibit JPV-2, Section 6.

b. Please design, or describe the design of, a heat pump rate that would eliminate the overpayment Mr. Velez identifies while remaining revenue neutral with respect to the residential class as a whole, and provide the resulting rates.

c. If Mr. Velez contends that no such rate is feasible, please explain why.

CIEC-16. Please refer to Velez Direct Testimony at page 5, lines 10-13, and page 30, lines 9-17.

a. Please confirm that the cross-subsidy Mr. Velez identifies is a cross-subsidy within the residential class.

b. Please explain why any revenue reduction resulting from a remedy for a cross-subsidy within the residential class should, or should not, be borne by customers outside the residential class.

CIEC-17. Please refer to Velez Direct Testimony at page 100, lines 11-13.

a. Please explain what Mr. Velez means by pricing incremental heat pump loads at "(closer to)" marginal cost, and state whether he believes incremental heat pump load should make any contribution to the recovery of embedded T&D costs.

b. If Mr. Velez believes incremental heat pump load should make some contribution to embedded T&D costs, please quantify the contribution reflected in Rate HP.

CIEC-18. Please refer to Velez Direct Testimony at page 58, lines 11-19, and footnotes 60 and 61, which describe the Regulatory Assistance Project's Electric Cost Allocation for a New Era: A Manual (January 2020) (the "RAP Cost Allocation Manual") as "widely referenced."

a. Please explain the basis for Mr. Velez's characterization of the RAP Cost Allocation Manual as "widely referenced," and identify each source, study, citation count or other information on which he relies for that characterization.

b. Please identify each decision or order of a state public utility commission, the Federal Energy Regulatory Commission or a Canadian regulatory board of which Mr. Velez is aware that cites the RAP Cost Allocation Manual. For each, provide the jurisdiction, docket number and date, the proposition for which the RAP Cost Allocation Manual was cited, and a copy of the relevant pages.

c. Please identify each decision or order of a regulatory commission of which Mr. Velez is aware in which the RAP Cost Allocation Manual was cited as part of the basis for the commission's decision. For each, provide the jurisdiction, docket number and date, identify the determination the RAP Cost Allocation Manual was cited to support, and provide a copy of the relevant pages.

d. For each decision identified in part (b), please state whether the commission adopted the cost allocation or rate design approach recommended in the RAP Cost Allocation Manual on the issue for which it was cited.

e. Please identify each decision or order of which Mr. Velez is aware in which a regulatory commission rejected or declined to adopt a cost allocation or rate design approach recommended in the RAP Cost Allocation Manual, and provide a copy of the relevant pages.

f. Please identify any decision of the Authority that cites or relies on the RAP Cost Allocation Manual, and the proposition for which it was cited.

g. Please state whether, to Mr. Velez's knowledge, the RAP Cost Allocation Manual has been adopted, endorsed or approved by the National Association of Regulatory Utility Commissioners or by any state regulatory commission as a guide for cost allocation. If so, identify the adoption, endorsement or approval.

CIEC-19. Please refer to Velez Direct Testimony at page 58, lines 11-19, and footnotes 60 and 61.

a. Please identify each portion of Velez Direct Testimony in which Mr. Velez relies on the RAP Cost Allocation Manual, and state the proposition for which he relies on it in each instance.

b. Please state whether Mr. Velez is aware of any criticism or rebuttal of the RAP Cost Allocation Manual's recommendations that has been presented in testimony, reports or other publications, and identify any such materials he has reviewed.

c. Please describe Mr. Velez's understanding of whether the RAP Cost Allocation Manual was subject to peer review, or to review by utility, industrial customer or other stakeholder representatives, before publication.

d. Please identify each proceeding in which Mr. Velez or Switchbox has cited the RAP Cost Allocation Manual in testimony, reports or comments, and state the outcome on the issue for which it was cited.