**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** |
| | | **:** | **NOVEMBER 5, 2026** |

# THE OFFICE OF CONSUMER COUNSEL'S THIRTY-SECOND 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 **November 19, 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-1017 through OCC-1021 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):**

OCC-1017. (STORM COSTS) If the Company can attribute storm damage to a customer's actions/inactions (not vegetation related), does the Company attempt to recover associated restoration costs from the customer? If yes, please provide a list of all attempts and recovered amounts from 2018-the present.

OCC-1018. (COMPANY VEHICLES) Please refer to the Response to OCC-983, which states, "Fleet-management and telematics systems provide visibility into vehicle utilization and driver activity."

a. Please describe the fleet management and telematics systems referenced in the response.
b. Does the Company use GPS or similar systems to track where the company vehicles are driven?

OCC-1019. (MS24E - CAR VS. POLE) Please refer to the Response to EOE-406, Attachment 1, indicating that OMS 5274189 was a car vs. pole. Please indicate if the "Outage Primary down, Repaired Primary in 3 locations & Restored Outage" noted in Exhibit ACCT-2 (CLP-5A-02)(MS24E), p. 112, with the same OMS number was included in the requested recovery. If yes, please explain.

OCC-1020. (STORM STAFFING ) Please refer to the Response to EOE-126, which states that "the Company has been executing a strategic staffing plan since 2017." Have these plans been documented in written form? If so, please produce all written plans from 2018 to the present.

OCC-1021. (VEGETATION MANAGEMENT CREW TIME) Please refer to the Response to EOE-129, which states that tree crews have no different billing rate for standby versus work time, and standby on a timesheet means the crew is waiting to work. Has the Company examined the amount of standby time noted on tree crew timesheets from 2018 to the present? If so, please provide that analysis.

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 5th day of November, 2026.

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