Date Filed: October 27, 2026

Witness: Warren R. Boutin and Andrew C. Belden
Request from: ALLCO

Question:

(Follow-up to ICC-013 and ICC-016 — application-to-agreement timing by category.) ICC-013, Attachment 1, reports the business days from application receipt to issuance of an Interconnection Agreement for all applications (78,740 since January 2020; mean 17.7 business days), and ICC-016 reports agreement-to-Permission-to-Operate timing separately for four categories. (a) Provide the ICC-013 schedule (projects, mean, and median business days by month) separately for the same four categories used in ICC-016 — residential inverter-based generators of 50 kW or less; Fast Track residential above 50 kW; commercial and industrial of 2 MW or less; and study-process projects above 2 MW — and, for the last two categories, separately for applications that required electric power system modifications or upgrades. (b) For each category, state the number of applications received since January 1, 2020, for which no Interconnection Agreement has been issued as of the date of the response, the number of those that the Company has tendered but not countersigned, and the mean and maximum elapsed business days for each group. (c) Explain why ICC-013, Attachment 1, reports a monthly median that exceeds the monthly mean in numerous months (e.g., January 2020: mean 5.98, median 22.5), identify any negative or zero durations in the underlying data and their cause, and state whether the "Mean" and "Average" columns are computed differently.

Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company states as follows:

a. Please refer to ALLCO-159, Attachment 1, through ALLCO-159, Attachment 4, for the requested information.

    a. ALLCO-159, Attachment 1 – Residential Less than 50kW
        i. Please note, in ALLCO-159, Attachment 1. The median business day column shows 0 or 1 or 2 days for some months. These numbers are correct

as the applications were processed on the same day or within one or two days from receipt.

b. ALLCO-159, Attachment 2 – Fast track Greater than 50kW
c. ALLCO-159, Attachment 3 – Less than 2MW
d. ALLCO-159, Attachment 4 – Greater than 2MW

b. Please refer to the Company's response to ALLCO-017[i].

c. The mean and the median are derived differently. The mean is the average of the total days divided by the number of projects. Whereas the median is the middle number when the numbers are arranged from smallest to largest, or the average of the two middle numbers if it is an even number. The "Mean" and "Average" were requested by the intervenor, which are the same. Thus, the Average column repeats the information in the Mean column.

Prior Referenced Response:

[i] ALLCO-017 Question:

State the average and maximum elapsed time, in each year 2019 through 2025, between the Company's receipt of an interconnection agreement executed by a Connecticut generator and the Company's countersignature and return of that agreement, and identify each instance exceeding 180 days, including project LEG-22708.

ALLCO-017 Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company does not track information on the average and maximum elapsed time between the receipt of a partially-executed interconnection agreement ("IA") from a Generator and the Company's countersignature and return of the fully-executed IA to the Generator. Starting in early 2026, the IA execution process was enhanced to leverage automation available in PowerClerk; therefore, the execution dates are now recorded electronically in a software platform.