Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Combined true-ups.) Verogy Holdings testified on October 21, 2026 that the Company "insisted that no single true-up would be processed until an agreement was reached regarding all other prior projects submitted by Verogy" (Verogy Testimony at 7). State whether the Company has a policy or practice of withholding, delaying, or conditioning the final accounting or true-up of one interconnection project on the resolution of accountings for other projects of the same developer or its affiliates; identify the provision of the Guidelines, the Standard IA, or any Authority decision that authorizes that practice; identify each developer (by anonymized identifier if the Company contends confidentiality), the projects, and the periods during which the practice was applied since January 1, 2019; state whether the practice was applied to any project of Allco or its affiliates; and identify the person who approved the practice.

Response:

Eversource objects to this request. The requested information concerning the final accounting or true-up for interconnection projects is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19 to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added).

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Similarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request concerns the final accounting or true-up for interconnection projects, which is not relevant or material to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Removal of the cost-estimate accuracy clause.) Verogy Holdings testified that Interconnection Agreements issued through 2023 stated in Appendix G that "Price is based on Impact study with an accuracy of +/- 25%," and that "more recent interconnection agreements remove this requirement" (Verogy Testimony at 11–12). State the date on which, and the Standard IA revision in which, the accuracy language was removed; identify the person who approved the removal and the reasons; state whether the removal was filed with or approved by the Authority, identifying the docket; produce each version of the Standard IA and its Appendix G in use since January 1, 2019; and state, for each year 2019 through 2026, the number of executed Interconnection Agreements whose final cost exceeded the Appendix G estimate by more than 25 percent and the aggregate amount of the excess billed to interconnection customers.

Response:

Eversource objects to this request. The requested information concerning the removal of language from Standard Interconnection Agreements is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19 to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added).

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Similarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request concerns the removal of language from Standard Interconnection Agreements, which is not relevant or material to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Real-Time Automation Controller charges.) Verogy Holdings and Earthlight Technologies testified that the Company requires a Real-Time Automation Controller ("RTAC") on projects of 500 kW and larger and bills it at approximately $75,000 to $90,000 per unit, with additional customer equipment of approximately $27,500 and studies of $22,500 or more, against a procurement cost of approximately $15,000 (Verogy Testimony at 13–14; Earthlight Testimony at 14–15). State the date on which, and the document by which, the RTAC requirement and the 500 kW threshold were adopted, and whether either was filed with or approved by the Authority; produce the Company's build-up of the per-unit charge (equipment, labor, engineering, overhead loaders, and any other component, by amount); state the number of RTAC units billed to interconnection customers in each year 2022 through 2026 and the total billed; state whether the RTAC is Company-owned plant recorded in rate base and, if so, the account and amount; and state whether the Company permits an interconnection customer to procure an equivalent device and, if not, why not.

Response:

Eversource objects to this request. The requested information concerning the Company's RTAC requirements not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19 to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super.

Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added).

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Similarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request concerns the Company's RTAC requirements, which is not relevant or material to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(SHARE cost estimates — overhead loaders.) For each investment proposed under the Shared Hosting for Advancement of Renewable Energy ("SHARE") program (Exhibit CLP-TSP-1 at 60–70; Exhibit CLP-TSP-3 at 143–149), state, in native format: (a) the estimated direct cost of labor, materials, contractors and equipment; (b) each overhead, loader, adder or clearing-account allocation included in the estimate (including the ZNP, ZPB, ZGS, ZST, ZLO, ZMI, ZAS, ZEL/ZEB and ZVE loaders described in ALLCO-102, Attachment 1, and any A&G, engineering, supervision, AFUDC or contingency component), with the rate and dollar amount of each; and (c) the resulting total; and reconcile the totals to the $47.6 million requested for the TSP term and the approximately $275 million total program cost.

Response:

Eversource objects to this request as unduly repetitious and unduly burdensome. Connecticut law expressly provides that administrative agencies shall exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-102[i]; ALLCO-175[ii]; and ALLCO-176[iii], which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate purpose, unnecessarily duplicates discovery, and imposes an undue burden on the Company to repeatedly address the same matters.

Prior Referenced Response:

[i] ALLCO-102 Question:

For the percentage overhead loaders applied to interconnection cost estimates, invoices, and contributions in aid of construction ("CIAC") for distributed-generation and qualifying-facility interconnections at any time from 2017 through the present: (a) identify each person who established, calculated, approved, or revised the loader percentages, and each person or group with authority to approve deviations from them; (b) identify the written policy, procedure, methodology document, or workpaper in which each loader percentage and its derivation is recorded, and produce each; (c) state, for each loader, whether it was developed by CL&P, ESC, Burns & McDonnell Engineering Company, Inc. ("Burns & McDonnell"), or another entity, and identify the entity and organizational unit; and (d) state whether any loader percentage applied to interconnection charges was ever reviewed for consistency with actual incurred costs before December 2024, and if so, identify each review, its date, its author, and its conclusion, and produce it.

ALLCO-102 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 ESC Investment Planning, Corporate Accounting, Plant Accounting and Accounts Payable departments are responsible for creating and maintaining the rates.

The Company uses either historical costs or budgeted information to develop its overhead rates. The rates are calculated annually and maintained by the Investment Planning, Corporate Accounting, Plant Accounting and Accounts Payable departments and updated as needed. The overhead charges are calculated by applying the applicable overhead rate to the direct charged cost elements applicable for that overhead (i.e., Labor, Material, Contractors, etc.). Therefore, for a project to be eligible to receive overheads, it must have direct spending.

[ii] ALLCO-175 Question:

(Follow-up to ALLCO-102 — persons, rates, and prior review.) ALLCO-102 asked the Company to identify each person who established, calculated, approved, or revised the overhead loader percentages and each person or group with authority to approve deviations (subpart (a)); to state whether each loader was developed by CL&P, ESC, Burns & McDonnell, or another entity (subpart (c)); and to state whether any loader was reviewed for consistency with actual incurred costs before December 2024 (subpart (d)). The response names four departments and attaches a methodology document "Last Updated: 5/16/25." State: (a) by name and title, each person in the ESC Investment Planning, Corporate Accounting, Plant Accounting, and Accounts Payable departments who calculated or approved the CL&P rate for each cost element (ZNP, ZPB, ZGS, ZST, ZLO, ZMI, ZAS, ZEL, ZEB, ZVE, and any other loader applied to distribution construction work orders) in each year 2017 through 2026, and each person or group with authority to approve a deviation; (b) the rate for each such cost element in effect for CL&P in each year 2017 through 2026, with the effective date of each change, in native format; (c) the annual rate-calculation workpapers for each cost element for 2017 through 2026; (d) each version of the methodology document in force before May 16, 2025, and the changes made on that date; (e) whether any loader was developed, recommended, or benchmarked by Burns & McDonnell or any other outside firm, identifying the firm and the engagement; and (f) the answer to subpart (d) of ALLCO-102 — whether any loader percentage applied to interconnection charges was reviewed for consistency with actual incurred costs before December 2024, identifying each review, its date, author, and conclusion.

ALLCO-175 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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

[iii] ALLCO-176 Question:

(Follow-up to ALLCO-102, Attachment 1 — application of the clearing-rate loaders to customer-funded work orders.) ALLCO-102, Attachment 1 states that the Administrative Salaries & Expense (AS&E) overhead "is applied to all capital work order charges … excluding the following: CIAC, Reimbursables, AFUDC, Salvage, UVLs and AS&E," and that the AS&E, Miscellaneous Distribution Expense Capitalization (MDEC), and Engineering & Supervision (E&S) rates are "fixed clearing rate[s]" maintained "to maintain a balance equal to $0 to +/- 1 month of activity in the clearing work orders." State: (a) whether the exclusion of "CIAC" and "Reimbursables" from the AS&E base refers to cost elements credited to a work order or to work orders that are funded by customer contributions or reimbursements, and identify the cost elements (A21, A61 through A69, LCO, M15, U01 through U10, UVL, ZAS, Z02) to which the words "CIAC" and "Reimbursables" correspond; (b) whether AS&E, MDEC, E&S, ZPB, ZGS, ZNP, and ZVE were applied, in each year 2017 through 2025, to work orders for distributed-generation interconnection facilities and upgrades whose cost is reimbursed in whole or in part by the interconnection customer, and the authority (tariff, Guideline provision, Authority order, or Company policy) for doing so; (c) whether the amount loaded to a customer-reimbursed interconnection work order by a clearing-rate loader represents costs incurred for that work order or a pro-rata share of a company-wide pool of costs that would otherwise be allocated to the Company's own capital projects; (d) whether amounts recovered from interconnection customers through those loaders are credited to the corresponding clearing work orders — thereby reducing the overhead allocated to projects in Exhibits CLP-ADDITIONS-1 through -6 and in rate base — or are retained by the Company, identifying the accounting entries; (e) the total amount of each loader recovered from interconnection customers in each year 2017 through 2025; and (f) the mechanism by which the indirect and overhead amounts shown on the distributed-generation interconnection project closing reports in Exhibit CLP-ADDITIONS-6 Supplemental (filed October 1, 2026) come to range from roughly 40 percent to more than 130 percent of direct cost, and whether the Company contends that each such amount reflects costs actually incurred for the project on which it was charged.

ALLCO-176 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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(SHARE participant fee.) State the formula by which the fixed $/kW fee to be charged to DER participants in a SHARE group solution is, or will be, derived; state whether the fee is computed on the gross estimated cost of the group solution (including the overhead loaders identified in response to Q-ALLCO-237) or on direct cost only; state whether the fee is subject to final accounting or true-up against actual cost; and produce each workpaper, presentation or memorandum in which the fee methodology has been developed or presented to PURA, DEEP, the Interconnection Customer Coalition or any stakeholder group.

Response:

Eversource objects to this request as unduly repetitious and unduly burdensome. Connecticut law expressly provides that administrative agencies shall exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-011[i]; ALLCO-012[ii]; ALLCO-014[iii]; ALLCO-56[iv]; and ALLCO-176[v], which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate purpose, unnecessarily duplicates discovery, and imposes an undue burden on the Company to repeatedly address the same matters.

Prior Referenced Response:

[i] ALLCO-011 Question:

Produce the "preliminary analysis" referenced in Exhibit CLP-TSP-3 at 144 supporting the proposed "Avg. Interconnection Fee: < $500/kW," and the workpapers supporting the prospective SHARE fees of $392/kW (Tracy 14M group), $308/kW (Frybrook 13B group), and $192/kW (Campville 14R group) and the associated total distribution investment estimates of $180 million, $30 million, and $65 million (Exhibit CLP-TSP-3 at 146-149).

ALLCO-011Response:

The high-level planning estimates were produced utilizing historical project and unit costs for the preliminary anticipated scopes of these projects. As the SHARE program is a proposed concept, at this time, specific impact studies have not been completed, no level engineering has been performed, and therefore estimates are not available with any

more detail than provided in this response. Following PURA's approval of the SHARE program and the proposed projects, engineering studies would be conducted to develop more detailed scopes and estimates, and project benefits, costs, viability and constructability would evaluated during our internal capital project review and approval process.

The SHARE fee represented in the testimony was produced with the following formula:

$$SHARE\ FEE\ in\ \$/kW = \frac{\text{Total DER Customer Benefit Upgrade Cost in \$M}}{\text{Estimated Enabled Commercial DER Capacity in MVA}} x1000$$

where 1000 represents the combined unit conversion of Millions of Dollars to Dollars and MVA to kW:

$$\$1000/kW = \frac{\$1{,}000{,}000}{1000\ \text{kW}}$$

In these calculations, kW and MW are used synonymously with kVA and MVA given the typical unity power factor of inverter-based generation while substation assets are rated in Volt-Amperes to account for both the apparent and reactive components of capacity of the equipment.

A breakdown of the components for the Tracy 14M Group SHARE fee is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Total Upgrade Cost
Distribution Station	$61.0M	$44M	$35M	$140M
Distribution Line	$24.5M	$7M	$9M	$40M
Total:	$85.5M			$180M
Enabled Capacity:	218 MVA			
SHARE Fee:	$392 /KW			

The SHARE fee represented in this table is produced with the following formula:

$$\$392/kW = \frac{\$85.5M}{218MVA} x1000$$

A breakdown of the components for the Frybrook 13B Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$9.1M	$11M	$0M	$20M
Distribution Line	$7.2M	$2M	$1M	$10M
Total:	$16.3M			$30M
Enabled Capacity:	53 MVA			
SHARE Fee:	$308 /KW			

The SHARE fee represented in this table is produced with the following formula:

$$\$308/kW = \frac{\$16.3M}{53MVA} x1000$$

A breakdown of the components for the Campville 14R Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$28.0M	$21M	$5M	$54M
Distribution Line	$8.1M	$2M	$1M	$11M
Total:	**$36.1M**			**$65M**
Enabled Capacity:	**188 MVA**			
SHARE Fee:	**$192 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$192/kW = \frac{\$36.1M}{188MVA} x1000$$

[ii] ALLCO-012 Question:

Explain how SHARE program investments and SHARE fee revenues would be treated in rate base, depreciation expense, and the revenue requirement, in this docket and prospectively; state whether any SHARE-related capital expenditures are included in the capital additions or five-year investment plan for which recovery is sought in this docket; and identify them.

ALLCO-012 Response:

In Docket No. 22-06-29RE01, the Company introduced the Shared Hosting for Advancement of Renewable Energy ("SHARE") program as a means to cost effectively enable Distributed Energy Resource ("DER") interconnection and to ensure that interconnection upgrade costs are equitably allocated among DER customers and non-DER customers. In that proceeding, the EDCs (CL&P and The United Illuminating Company) collectively submitted comments in response to PURA's Notice of Request for Written Comments issued on December 22, 2023. In those comments, the EDCs comments indicated that the following framework would need to be established in order to effectuate the SHARE program:

> The EDC will recover the costs of the Interconnection Solution through two channels. First, interconnecting customers in the Group will offset the upfront construction or implementation costs through a $/kW Interconnection Solution fee based on the interconnecting facility's prorata share of the cost of the Interconnection Solution. Interconnecting customers in the Group shall pay a portion of the total Interconnection Solution cost based on technical analysis. This fee will be treated as a contribution in aid of construction ("CIAC") and will be grossed up for taxes to ensure the full CIAC, plus gross-up, will hold distribution customers harmless on the deferred income tax implication to rate base in each Company's next rate case. Second, the EDC will recover the remaining Interconnection Solution incurred costs with subsequent recovery from distribution customers through a rate reconciliation mechanism the Authority reviews and approves in the RAM proceeding. Distributed energy resource (DER) facilities that connect to the distribution system at a

future time using the newly enabled hosting capacity will pay all of the associated Interconnection Solution fee, which will be flowed through the same rate reconciliation mechanism and credited back todistribution customers. *Docket 22-06-29RE01, February 14, 2024 EDC comments in response to PURA request for written comments on December 22, 2023.*

In this proceeding, the Company presented Exhibit CLP-TSP-3 in which it provided three investment scenarios; 1) Sustained Performance, 2) Targeted System Performance, and 3) Advancing the Grid. In this proceeding, the Company has proposed to implement in base rates the capital expenditures associated with the Targeted System Performance scenario presented in Exhibit CLP-TSP-3, which does not include SHARE investments.

However, the five-year investment Advancing the Grid plan includes specific investments to upgrade 3 bulk substations, build 2 new bulk substations and add new distribution feeder capacity in three (3) areas of the system to improve hosting capacity for DER integration. The high-level planning estimate for these major upgrades is approximately $275M, which would be allocated equally between DER customers and distribution customers based on a preliminary technical review of benefits (Exhibit CLP-TSP-3 at 146 to 149). Based on anticipated study, engineering, and construction schedules, $47.6M of capital expenditure is included in the five-year investment plan under the Advancing the Grid Investment Scenario (Exhibit CLP-TSP-3 at 9).

Should PURA opt to support the Advancing the Grid plan as part of this proceeding, or, in a future proceeding, implement the SHARE program and associated cost recovery as proposed by the EDCs in Docket No. 22-06-29RE01, the gross investments would be reflected in plant in service installed by the Company. As described above, Interconnection Solution fees would be collected as a CIAC which would offset plant in service in rate bae. Depreciation expense would be calculated on the gross plant additions, less the CIAC. The revenue requirement that customers would pay through a rate reconciliation mechanism would be calculated on the gross plant investment, less the CIAC.

[iii] ALLCO-014 Question:

State whether participation in the SHARE program would be a condition of interconnection for new or pending applications in SHARE target areas, and describe the interconnection path and cost responsibility for a queued project in a SHARE target area that declines to pay the SHARE fee.

ALLCO-014 Response:

If the SHARE Program is approved, the Company will work with stakeholders to develop a Group Study Agreement. Based on experience in another jurisdiction, new or pending applications in SHARE target areas would have the option to participate in the SHARE Group Study that determines the Group Solution and associated SHARE fee. If a project elects not to participate in the Group Study, the opt-out project will be queued for study after the Group Study is complete. If there is excess enabled capacity (due to use of standard size equipment) remaining after the Group Study projects have received interconnection agreements (IA), any remaining projects in queue would be eligible to connect and pay the SHARE fee (after their subsequent study). A queued project in a SHARE target area that declines to pay the SHARE fee would be removed from the queue, consistent how a project that declines to pay for the system upgrades identified in a study and outlined in an IA is treated under the current interconnection process.

[iv] ALLCO-056 Question:

Follow-up to the Company's response to Q-ALLCO-011 (basis for SHARE program fees). The Company's response states that the allocation of substation project costs to distributed energy resources for purposes of the SHARE fee is based on a "preliminary technical review," and the Company's prefiled testimony references a preliminary analysis

(Exhibit CLP-TSP-3 at 144). Produce the preliminary technical review and any preliminary analysis — including all workpapers, models, and calculations in native (Excel) format with formulas intact — supporting the allocation of $85.5 million of the Tracy substation project, $16.3 million of the Frybrook substation project, and $36.1 million of the Campville substation project to distributed energy resources. If no such review or analysis exists in documentary form, so state, and identify each person who performed the review, when it was performed, and the methodology and inputs used.

ALLCO-056 Response:

Please refer to ALLCO-056, Attachment 1, which contains the analysis of the cost allocation of these projects.

This document constitutes an original engineering work product developed by Company engineers through meetings, conference calls, technical evaluations, and the application of professional engineering judgment. The values, assumptions, and conclusions set forth herein are the result of that engineering analysis and reflect the team's final determinations. To the extent information from various sources was considered during the analytical process, the values and conclusions contained in this document represent the engineering team's independent professional judgments and comprise the work product underlying this analysis.

[v] ALLCO-176 Question:

(Follow-up to ALLCO-102, Attachment 1 — application of the clearing-rate loaders to customer-funded work orders.) ALLCO-102, Attachment 1 states that the Administrative Salaries & Expense (AS&E) overhead "is applied to all capital work order charges … excluding the following: CIAC, Reimbursables, AFUDC, Salvage, UVLs and AS&E," and that the AS&E, Miscellaneous Distribution Expense Capitalization (MDEC), and Engineering & Supervision (E&S) rates are "fixed clearing rate[s]" maintained "to maintain a balance equal to $0 to +/- 1 month of activity in the clearing work orders." State: (a) whether the exclusion of "CIAC" and "Reimbursables" from the AS&E base refers to cost elements credited to a work order or to work orders that are funded by customer contributions or reimbursements, and identify the cost elements (A21, A61 through A69, LCO, M15, U01 through U10, UVL, ZAS, Z02) to which the words "CIAC" and "Reimbursables" correspond; (b) whether AS&E, MDEC, E&S, ZPB, ZGS, ZNP, and ZVE were applied, in each year 2017 through 2025, to work orders for distributed-generation interconnection facilities and upgrades whose cost is reimbursed in whole or in part by the interconnection customer, and the authority (tariff, Guideline provision, Authority order, or Company policy) for doing so; (c) whether the amount loaded to a customer-reimbursed interconnection work order by a clearing-rate loader represents costs incurred for that work order or a pro-rata share of a company-wide pool of costs that would otherwise be allocated to the Company's own capital projects; (d) whether amounts recovered from interconnection customers through those loaders are credited to the corresponding clearing work orders — thereby reducing the overhead allocated to projects in Exhibits CLP-ADDITIONS-1 through -6 and in rate base — or are retained by the Company, identifying the accounting entries; (e) the total amount of each loader recovered from interconnection customers in each year 2017 through 2025; and (f) the mechanism by which the indirect and overhead amounts shown on the distributed-generation interconnection project closing reports in Exhibit CLP-ADDITIONS-6 Supplemental (filed October 1, 2026) come to range from roughly 40 percent to more than 130 percent of direct cost, and whether the Company contends that each such amount reflects costs actually incurred for the project on which it was charged.

ALLCO-176 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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Accounting for SHARE participant payments.) State the accounting entries the Company proposes for amounts paid by DER participants under SHARE — identifying the FERC account(s) to be credited (including whether such amounts will be recorded as contributions in aid of construction credited against plant in Accounts 101/106, as customer advances in Account 252, as revenue, or otherwise), the timing of each entry, and whether such amounts will be reflected in the Company's rate base, revenue requirement or any reconciling mechanism in this proceeding or any subsequent rate proceeding; and state whether the same accounting is applied today to interconnection customer payments for system modifications and network upgrades.

Response:

Eversource objects to this request as unduly repetitious and unduly burdensome. Connecticut law expressly provides that administrative agencies shall exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-011[i]; ALLCO-012[ii]; ALLCO-014[iii]; ALLCO-56[iv]; and ALLCO-176[v], which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate purpose, unnecessarily duplicates discovery, and imposes an undue burden on the Company to repeatedly address the same matters.

Prior Referenced Response:

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[i] ALLCO-011 Question:

Produce the "preliminary analysis" referenced in Exhibit CLP-TSP-3 at 144 supporting the proposed "Avg. Interconnection Fee: < $500/kW," and the workpapers supporting the prospective SHARE fees of $392/kW (Tracy 14M group), $308/kW (Frybrook 13B group), and $192/kW (Campville 14R group) and the associated total distribution investment estimates of $180 million, $30 million, and $65 million (Exhibit CLP-TSP-3 at 146-149).

ALLCO-011Response:

The high-level planning estimates were produced utilizing historical project and unit costs for the preliminary anticipated scopes of these projects. As the SHARE program is a proposed concept, at this time, specific impact studies have not been completed, no level engineering has been performed, and therefore estimates are not available with any more detail than provided in this response. Following PURA's approval of the SHARE program and the proposed projects, engineering studies would be conducted to develop more detailed scopes and estimates, and project benefits, costs, viability and constructability would evaluated during our internal capital project review and approval process.

The SHARE fee represented in the testimony was produced with the following formula:

$$SHARE\ FEE\ in\ \$/kW = \frac{\text{Total DER Customer Benefit Upgrade Cost in \$M}}{\text{Estimated Enabled Commercial DER Capacity in MVA}} x1000$$

where 1000 represents the combined unit conversion of Millions of Dollars to Dollars and MVA to kW:

$$\$1000/kW = \frac{\$1{,}000{,}000}{1000\ \text{kW}}$$

In these calculations, kW and MW are used synonymously with kVA and MVA given the typical unity power factor of inverter-based generation while substation assets are rated in Volt-Amperes to account for both the apparent and reactive components of capacity of the equipment.

A breakdown of the components for the Tracy 14M Group SHARE fee is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Total Upgrade Cost
Distribution Station	$61.0M	$44M	$35M	$140M
Distribution Line	$24.5M	$7M	$9M	$40M
Total:	$85.5M			$180M
Enabled Capacity:	218 MVA			
SHARE Fee:	$392 /KW			

The SHARE fee represented in this table is produced with the following formula:

$$\$392/kW = \frac{\$85.5M}{218MVA} x1000$$

A breakdown of the components for the Frybrook 13B Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$9.1M	$11M	$0M	$20M
Distribution Line	$7.2M	$2M	$1M	$10M
Total:	$16.3M			$30M
Enabled Capacity:	53 MVA			
SHARE Fee:	$308 /KW			

The SHARE fee represented in this table is produced with the following formula:

$$\$308/kW = \frac{\$16.3M}{53MVA} x1000$$

A breakdown of the components for the Campville 14R Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$28.0M	$21M	$5M	$54M
Distribution Line	$8.1M	$2M	$1M	$11M
Total:	**$36.1M**			**$65M**
Enabled Capacity:	**188 MVA**			
SHARE Fee:	**$192 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$192/kW = \frac{\$36.1M}{188MVA} x1000$$

[ii] ALLCO-012 Question:

Explain how SHARE program investments and SHARE fee revenues would be treated in rate base, depreciation expense, and the revenue requirement, in this docket and prospectively; state whether any SHARE-related capital expenditures are included in the capital additions or five-year investment plan for which recovery is sought in this docket; and identify them.

ALLCO-012 Response:

In Docket No. 22-06-29RE01, the Company introduced the Shared Hosting for Advancement of Renewable Energy ("SHARE") program as a means to cost effectively enable Distributed Energy Resource ("DER") interconnection and to ensure that interconnection upgrade costs are equitably allocated among DER customers and non-DER customers. In that proceeding, the EDCs (CL&P and The United Illuminating Company) collectively submitted comments in response to PURA's Notice of Request for Written Comments issued on December 22, 2023. In those comments, the EDCs comments indicated that the following framework would need to be established in order to effectuate the SHARE program:

> The EDC will recover the costs of the Interconnection Solution through two channels. First, interconnecting customers in the Group will offset the upfront construction or implementation costs through a $/kW Interconnection Solution fee based on the interconnecting facility's prorata share of the cost of the Interconnection Solution. Interconnecting customers in the Group shall pay a portion of the total Interconnection Solution cost based on technical analysis. This fee will be treated as a contribution in aid of construction ("CIAC") and will be grossed up for taxes to ensure the full CIAC, plus gross-up, will hold distribution customers harmless on the deferred income tax implication to rate base in each Company's next rate case. Second, the EDC will recover the remaining Interconnection Solution incurred costs with subsequent recovery from distribution customers through a rate reconciliation mechanism the Authority reviews and approves in the RAM

proceeding. Distributed energy resource (DER) facilities that connect to the distribution system at a future time using the newly enabled hosting capacity will pay all of the associated Interconnection Solution fee, which will be flowed through the same rate reconciliation mechanism and credited back todistribution customers. *Docket 22-06-29RE01, February 14, 2024 EDC comments in response to PURA request for written comments on December 22, 2023.*

In this proceeding, the Company presented Exhibit CLP-TSP-3 in which it provided three investment scenarios; 1) Sustained Performance, 2) Targeted System Performance, and 3) Advancing the Grid. In this proceeding, the Company has proposed to implement in base rates the capital expenditures associated with the Targeted System Performance scenario presented in Exhibit CLP-TSP-3, which does not include SHARE investments.

However, the five-year investment Advancing the Grid plan includes specific investments to upgrade 3 bulk substations, build 2 new bulk substations and add new distribution feeder capacity in three (3) areas of the system to improve hosting capacity for DER integration. The high-level planning estimate for these major upgrades is approximately $275M, which would be allocated equally between DER customers and distribution customers based on a preliminary technical review of benefits (Exhibit CLP-TSP-3 at 146 to 149). Based on anticipated study, engineering, and construction schedules, $47.6M of capital expenditure is included in the five-year investment plan under the Advancing the Grid Investment Scenario (Exhibit CLP-TSP-3 at 9).

Should PURA opt to support the Advancing the Grid plan as part of this proceeding, or, in a future proceeding, implement the SHARE program and associated cost recovery as proposed by the EDCs in Docket No. 22-06-29RE01, the gross investments would be reflected in plant in service installed by the Company. As described above, Interconnection Solution fees would be collected as a CIAC which would offset plant in service in rate bae. Depreciation expense would be calculated on the gross plant additions, less the CIAC. The revenue requirement that customers would pay through a rate reconciliation mechanism would be calculated on the gross plant investment, less the CIAC.

[iii] ALLCO-014 Question:

State whether participation in the SHARE program would be a condition of interconnection for new or pending applications in SHARE target areas, and describe the interconnection path and cost responsibility for a queued project in a SHARE target area that declines to pay the SHARE fee.

ALLCO-014 Response:

If the SHARE Program is approved, the Company will work with stakeholders to develop a Group Study Agreement. Based on experience in another jurisdiction, new or pending applications in SHARE target areas would have the option to participate in the SHARE Group Study that determines the Group Solution and associated SHARE fee. If a project elects not to participate in the Group Study, the opt-out project will be queued for study after the Group Study is complete. If there is excess enabled capacity (due to use of standard size equipment) remaining after the Group Study projects have received interconnection agreements (IA), any remaining projects in queue would be eligible to connect and pay the SHARE fee (after their subsequent study). A queued project in a SHARE target area that declines to pay the SHARE fee would be removed from the queue, consistent how a project that declines to pay for the system upgrades identified in a study and outlined in an IA is treated under the current interconnection process.

[iv] ALLCO-056 Question:

Follow-up to the Company's response to Q-ALLCO-011 (basis for SHARE program fees). The Company's response states that the allocation of substation project costs to distributed energy resources for purposes of the SHARE fee is

based on a "preliminary technical review," and the Company's prefiled testimony references a preliminary analysis (Exhibit CLP-TSP-3 at 144). Produce the preliminary technical review and any preliminary analysis — including all workpapers, models, and calculations in native (Excel) format with formulas intact — supporting the allocation of $85.5 million of the Tracy substation project, $16.3 million of the Frybrook substation project, and $36.1 million of the Campville substation project to distributed energy resources. If no such review or analysis exists in documentary form, so state, and identify each person who performed the review, when it was performed, and the methodology and inputs used.

ALLCO-056 Response:

Please refer to ALLCO-056, Attachment 1, which contains the analysis of the cost allocation of these projects.

This document constitutes an original engineering work product developed by Company engineers through meetings, conference calls, technical evaluations, and the application of professional engineering judgment. The values, assumptions, and conclusions set forth herein are the result of that engineering analysis and reflect the team's final determinations. To the extent information from various sources was considered during the analytical process, the values and conclusions contained in this document represent the engineering team's independent professional judgments and comprise the work product underlying this analysis.

[v] ALLCO-176 Question:

(Follow-up to ALLCO-102, Attachment 1 — application of the clearing-rate loaders to customer-funded work orders.) ALLCO-102, Attachment 1 states that the Administrative Salaries & Expense (AS&E) overhead "is applied to all capital work order charges … excluding the following: CIAC, Reimbursables, AFUDC, Salvage, UVLs and AS&E," and that the AS&E, Miscellaneous Distribution Expense Capitalization (MDEC), and Engineering & Supervision (E&S) rates are "fixed clearing rate[s]" maintained "to maintain a balance equal to $0 to +/- 1 month of activity in the clearing work orders." State: (a) whether the exclusion of "CIAC" and "Reimbursables" from the AS&E base refers to cost elements credited to a work order or to work orders that are funded by customer contributions or reimbursements, and identify the cost elements (A21, A61 through A69, LCO, M15, U01 through U10, UVL, ZAS, Z02) to which the words "CIAC" and "Reimbursables" correspond; (b) whether AS&E, MDEC, E&S, ZPB, ZGS, ZNP, and ZVE were applied, in each year 2017 through 2025, to work orders for distributed-generation interconnection facilities and upgrades whose cost is reimbursed in whole or in part by the interconnection customer, and the authority (tariff, Guideline provision, Authority order, or Company policy) for doing so; (c) whether the amount loaded to a customer-reimbursed interconnection work order by a clearing-rate loader represents costs incurred for that work order or a pro-rata share of a company-wide pool of costs that would otherwise be allocated to the Company's own capital projects; (d) whether amounts recovered from interconnection customers through those loaders are credited to the corresponding clearing work orders — thereby reducing the overhead allocated to projects in Exhibits CLP-ADDITIONS-1 through -6 and in rate base — or are retained by the Company, identifying the accounting entries; (e) the total amount of each loader recovered from interconnection customers in each year 2017 through 2025; and (f) the mechanism by which the indirect and overhead amounts shown on the distributed-generation interconnection project closing reports in Exhibit CLP-ADDITIONS-6 Supplemental (filed October 1, 2026) come to range from roughly 40 percent to more than 130 percent of direct cost, and whether the Company contends that each such amount reflects costs actually incurred for the project on which it was charged.

ALLCO-176 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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Date Filed: November 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

(SHARE plant in rate base.) For each SHARE investment, state the portion of the estimated cost the Company proposes to place in rate base and earn a return on (the "capital project cost component" referred to in OCC-583), the portion to be funded by DER participants, and the basis for the allocation; state whether DER participant payments will reduce the plant balance on which the Company proposes to earn a return before the plant is placed in service, and if not, why not; and state whether any overhead or administrative cost included in the participant-funded portion is also recovered from all customers through base rates, identifying the cost-of-service schedule and amount.

Response:

Eversource objects to this request as unduly repetitious and unduly burdensome. Connecticut law expressly provides that administrative agencies shall exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-011[i]; ALLCO-012[ii]; ALLCO-014[iii]; ALLCO-56[iv]; and ALLCO-176[v], which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate purpose, unnecessarily duplicates discovery, and imposes an undue burden on the Company to repeatedly address the same matters.

Prior Referenced Response:

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[i] ALLCO-011 Question:

Produce the "preliminary analysis" referenced in Exhibit CLP-TSP-3 at 144 supporting the proposed "Avg. Interconnection Fee: < $500/kW," and the workpapers supporting the prospective SHARE fees of $392/kW (Tracy 14M group), $308/kW (Frybrook 13B group), and $192/kW (Campville 14R group) and the associated total distribution investment estimates of $180 million, $30 million, and $65 million (Exhibit CLP-TSP-3 at 146-149).

ALLCO-011Response:

The high-level planning estimates were produced utilizing historical project and unit costs for the preliminary anticipated scopes of these projects. As the SHARE program is a proposed concept, at this time, specific impact studies

have not been completed, no level engineering has been performed, and therefore estimates are not available with any more detail than provided in this response. Following PURA's approval of the SHARE program and the proposed projects, engineering studies would be conducted to develop more detailed scopes and estimates, and project benefits, costs, viability and constructability would evaluated during our internal capital project review and approval process.

The SHARE fee represented in the testimony was produced with the following formula:

$$SHARE\ FEE\ in\ \$/kW = \frac{\text{Total DER Customer Benefit Upgrade Cost in \$M}}{\text{Estimated Enabled Commercial DER Capacity in MVA}} x1000$$

where 1000 represents the combined unit conversion of Millions of Dollars to Dollars and MVA to kW:

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In these calculations, kW and MW are used synonymously with kVA and MVA given the typical unity power factor of inverter-based generation while substation assets are rated in Volt-Amperes to account for both the apparent and reactive components of capacity of the equipment.

A breakdown of the components for the Tracy 14M Group SHARE fee is shown below:

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Total:	$85.5M			$180M
Enabled Capacity:	218 MVA			
SHARE Fee:	$392 /KW			

The SHARE fee represented in this table is produced with the following formula:

$$\$392/kW = \frac{\$85.5M}{218MVA} x1000$$

A breakdown of the components for the Frybrook 13B Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$9.1M	$11M	$0M	$20M
Distribution Line	$7.2M	$2M	$1M	$10M
Total:	$16.3M			$30M
Enabled Capacity:	53 MVA			
SHARE Fee:	$308 /KW			

The SHARE fee represented in this table is produced with the following formula:

$$\$308/kW = \frac{\$16.3M}{53MVA} x1000$$

A breakdown of the components for the Campville 14R Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$28.0M	$21M	$5M	$54M
Distribution Line	$8.1M	$2M	$1M	$11M
Total:	**$36.1M**			**$65M**
Enabled Capacity:	**188 MVA**			
SHARE Fee:	**$192 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$192/kW = \frac{\$36.1M}{188MVA} x1000$$

[ii] ALLCO-012 Question:

Explain how SHARE program investments and SHARE fee revenues would be treated in rate base, depreciation expense, and the revenue requirement, in this docket and prospectively; state whether any SHARE-related capital expenditures are included in the capital additions or five-year investment plan for which recovery is sought in this docket; and identify them.

ALLCO-012 Response:

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> The EDC will recover the costs of the Interconnection Solution through two channels. First, interconnecting customers in the Group will offset the upfront construction or implementation costs through a $/kW Interconnection Solution fee based on the interconnecting facility's prorata share of the cost of the Interconnection Solution. Interconnecting customers in the Group shall pay a portion of the total Interconnection Solution cost based on technical analysis. This fee will be treated as a contribution in aid of construction ("CIAC") and will be grossed up for taxes to ensure the full CIAC, plus gross-up, will hold distribution customers harmless on the deferred income tax implication to rate base in each Company's next rate case. Second, the EDC will recover the remaining Interconnection Solution incurred costs with subsequent recovery from distribution customers through a rate reconciliation mechanism the Authority reviews and approves in the RAM proceeding. Distributed energy resource (DER) facilities that connect to the distribution system at a

future time using the newly enabled hosting capacity will pay all of the associated Interconnection Solution fee, which will be flowed through the same rate reconciliation mechanism and credited back todistribution customers. *Docket 22-06-29RE01, February 14, 2024 EDC comments in response to PURA request for written comments on December 22, 2023.*

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However, the five-year investment Advancing the Grid plan includes specific investments to upgrade 3 bulk substations, build 2 new bulk substations and add new distribution feeder capacity in three (3) areas of the system to improve hosting capacity for DER integration. The high-level planning estimate for these major upgrades is approximately $275M, which would be allocated equally between DER customers and distribution customers based on a preliminary technical review of benefits (Exhibit CLP-TSP-3 at 146 to 149). Based on anticipated study, engineering, and construction schedules, $47.6M of capital expenditure is included in the five-year investment plan under the Advancing the Grid Investment Scenario (Exhibit CLP-TSP-3 at 9).

Should PURA opt to support the Advancing the Grid plan as part of this proceeding, or, in a future proceeding, implement the SHARE program and associated cost recovery as proposed by the EDCs in Docket No. 22-06-29RE01, the gross investments would be reflected in plant in service installed by the Company. As described above, Interconnection Solution fees would be collected as a CIAC which would offset plant in service in rate bae. Depreciation expense would be calculated on the gross plant additions, less the CIAC. The revenue requirement that customers would pay through a rate reconciliation mechanism would be calculated on the gross plant investment, less the CIAC.

[iii] ALLCO-014 Question:

State whether participation in the SHARE program would be a condition of interconnection for new or pending applications in SHARE target areas, and describe the interconnection path and cost responsibility for a queued project in a SHARE target area that declines to pay the SHARE fee.

ALLCO-014 Response:

If the SHARE Program is approved, the Company will work with stakeholders to develop a Group Study Agreement. Based on experience in another jurisdiction, new or pending applications in SHARE target areas would have the option to participate in the SHARE Group Study that determines the Group Solution and associated SHARE fee. If a project elects not to participate in the Group Study, the opt-out project will be queued for study after the Group Study is complete. If there is excess enabled capacity (due to use of standard size equipment) remaining after the Group Study projects have received interconnection agreements (IA), any remaining projects in queue would be eligible to connect and pay the SHARE fee (after their subsequent study). A queued project in a SHARE target area that declines to pay the SHARE fee would be removed from the queue, consistent how a project that declines to pay for the system upgrades identified in a study and outlined in an IA is treated under the current interconnection process.

[iv] ALLCO-056 Question:

Follow-up to the Company's response to Q-ALLCO-011 (basis for SHARE program fees). The Company's response states that the allocation of substation project costs to distributed energy resources for purposes of the SHARE fee is based on a "preliminary technical review," and the Company's prefiled testimony references a preliminary analysis

(Exhibit CLP-TSP-3 at 144). Produce the preliminary technical review and any preliminary analysis — including all workpapers, models, and calculations in native (Excel) format with formulas intact — supporting the allocation of $85.5 million of the Tracy substation project, $16.3 million of the Frybrook substation project, and $36.1 million of the Campville substation project to distributed energy resources. If no such review or analysis exists in documentary form, so state, and identify each person who performed the review, when it was performed, and the methodology and inputs used.

ALLCO-056 Response:

Please refer to ALLCO-056, Attachment 1, which contains the analysis of the cost allocation of these projects.

This document constitutes an original engineering work product developed by Company engineers through meetings, conference calls, technical evaluations, and the application of professional engineering judgment. The values, assumptions, and conclusions set forth herein are the result of that engineering analysis and reflect the team's final determinations. To the extent information from various sources was considered during the analytical process, the values and conclusions contained in this document represent the engineering team's independent professional judgments and comprise the work product underlying this analysis.

[v] ALLCO-176 Question:

(Follow-up to ALLCO-102, Attachment 1 — application of the clearing-rate loaders to customer-funded work orders.) ALLCO-102, Attachment 1 states that the Administrative Salaries & Expense (AS&E) overhead "is applied to all capital work order charges … excluding the following: CIAC, Reimbursables, AFUDC, Salvage, UVLs and AS&E," and that the AS&E, Miscellaneous Distribution Expense Capitalization (MDEC), and Engineering & Supervision (E&S) rates are "fixed clearing rate[s]" maintained "to maintain a balance equal to $0 to +/- 1 month of activity in the clearing work orders." State: (a) whether the exclusion of "CIAC" and "Reimbursables" from the AS&E base refers to cost elements credited to a work order or to work orders that are funded by customer contributions or reimbursements, and identify the cost elements (A21, A61 through A69, LCO, M15, U01 through U10, UVL, ZAS, Z02) to which the words "CIAC" and "Reimbursables" correspond; (b) whether AS&E, MDEC, E&S, ZPB, ZGS, ZNP, and ZVE were applied, in each year 2017 through 2025, to work orders for distributed-generation interconnection facilities and upgrades whose cost is reimbursed in whole or in part by the interconnection customer, and the authority (tariff, Guideline provision, Authority order, or Company policy) for doing so; (c) whether the amount loaded to a customer-reimbursed interconnection work order by a clearing-rate loader represents costs incurred for that work order or a pro-rata share of a company-wide pool of costs that would otherwise be allocated to the Company's own capital projects; (d) whether amounts recovered from interconnection customers through those loaders are credited to the corresponding clearing work orders — thereby reducing the overhead allocated to projects in Exhibits CLP-ADDITIONS-1 through -6 and in rate base — or are retained by the Company, identifying the accounting entries; (e) the total amount of each loader recovered from interconnection customers in each year 2017 through 2025; and (f) the mechanism by which the indirect and overhead amounts shown on the distributed-generation interconnection project closing reports in Exhibit CLP-ADDITIONS-6 Supplemental (filed October 1, 2026) come to range from roughly 40 percent to more than 130 percent of direct cost, and whether the Company contends that each such amount reflects costs actually incurred for the project on which it was charged.

ALLCO-176 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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.