Date Filed: November 09, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

With reference to the Company's response to OCC-929:

a. Did the Panel review the "requirements and documentation set forth as part of UI's current EDR program" when developing the proposal it advanced in this proceeding for an economic development rate ("EDR") incentive? If the answer is in the affirmative, explain how such review informed the Panel's proposals. If the answer is in the negative, explain why the Panel did not review that information.

b. Specify the basis on which Eversource anticipates that UI will file a new rate case in 2028.

c. Explain in detail information regarding the UI EDR that the Panel anticipates reviewing in Docket No. 28-08-08. Include in your response an explanation of why information that a different utility might file in a future rate proceeding is relevant to the development of an EDR for certain Eversource customers in this proceeding.

Response:

a. Yes. The Company's review of UI's EDR program requirements and documentation, and the basis upon which that EDR was developed, informed the purpose, scope and framework of the Company's proposed economic development incentive rate. Conceptually, the UI EDR offers a rate incentive by temporarily discounting distribution rates, which lowers operating costs for participating business customers. Structurally, the UI EDR provides an economic incentive by applying the distribution rate discount and thereby financial relief for electric service to eligible new or expanding loads, over a five-year term. Establishing a schedule of discounts provides these businesses with predictable, reduced overhead during the early growth or expansion phases of operations.

   Although the Company has indicated there are details that are under development with regard to its proposal, the UI EDR further informed the Company regarding considerations regarding having a standard or modified discount schedule, still within a five-year term, that need to be made, when evaluating and establishing the discounts for specific customers. The consideration of additional discounts on distribution rates (e.g., for new or incremental load for service in a distressed or environmental justice community) stimulated the Company's consideration of what costs due to discount are supported by other customers, and of what

consideration should be given in setting the level of discount to address the incremental costs (e.g., relative to what is recovered through discounted distribution rates) that may be incurred or required to interconnect and serve a customer's incremental or new load, such that cost shifting to other customers is avoided, and to provide any contribution toward the cost of service on the system that positively benefits all customers utilizing that system.

Additional details of this process are to be established; however, this aspect of the Company's proposal highlights the need to work with a given applicant to determine the level of discount, rather than have a standardized, fixed discount, for each specific customer, and ultimately as required in the UI EDR, promulgate the discount level and detailed terms of service under a service agreement. Also within the requirements reviewed and such agreement for the UI EDR is the requirement for a customer to meet and maintain performance milestones. Up front, a customer states its plan and the load it adds that would be afforded a discount under the EDR. The load a customer plans to add becomes the basis for what a customer would be required to achieve, and of the consequences of not meeting and potentially having to repay discounts provided.

Regarding scope, the UI EDR also informed minimum load levels; eligibility (e.g., targeting growth and stimulation that encourages businesses to bring in new service or expand existing facilities within the Company's service area that bring new capital, jobs, and incremental electric load into the regional economy; exclusion of local businesses); and whether potential caps are needed. Additionally, the requirement under the UI EDR of mandatory participation in clean energy or energy-efficiency programs informed the Company's EDR of the need for load management, by actively integrating efficiency or clean power measures rather than simply adding unmanaged load.

b. and c. The Company's reference to "Docket No. 28-08-08" is a typographic error; the correct docket reference should be to UI's rate case in Docket No. 22-08-08.

Date Filed: November 09, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

With reference to the Panel's response to OCC-930:

a. On what basis does the Panel assume that a decision that may be issued in Docket No. 28-08-08 will include regulatory objective standards applicable to the Eversource EDR? Explain your answer in detail.

b. Explain in detail why the decision to be issued at the end of UI's next electric rate proceeding is relevant to the development of an EDR for Eversource to implement in this proceeding.

Response:

Please refer to the Company's response to CIEC-031[i], subparts b. and c.

Prior Referenced Response

[i] CIEC-031 Question:

With reference to the Company's response to OCC-929:

a. Did the Panel review the "requirements and documentation set forth as part of UI's current EDR program" when developing the proposal it advanced in this proceeding for an economic development rate ("EDR") incentive? If the answer is in the affirmative, explain how such review informed the Panel's proposals. If the answer is in the negative, explain why the Panel did not review that information.

b. Specify the basis on which Eversource anticipates that UI will file a new rate case in 2028.

c. Explain in detail information regarding the UI EDR that the Panel anticipates reviewing in Docket No. 28-08-08. Include in your response an explanation of why information that a different utility might file in a future rate proceeding is relevant to the development of an EDR for certain Eversource customers in this proceeding.

CIEC-031 Response:

a. Yes. The Company's review of UI's EDR program requirements and documentation, and the basis upon which that EDR was developed, informed the purpose, scope and framework of the Company's proposed economic development incentive rate. Conceptually, the UI EDR offers a rate incentive by temporarily discounting distribution rates, which lowers operating costs for participating business customers. Structurally, the UI EDR provides an economic incentive by applying the distribution rate discount and thereby financial relief for electric

service to eligible new or expanding loads, over a five-year term. Establishing a schedule of discounts provides these businesses with predictable, reduced overhead during the early growth or expansion phases of operations.

Although the Company has indicated there are details that are under development with regard to its proposal, the UI EDR further informed the Company regarding considerations regarding having a standard or modified discount schedule, still within a five-year term, that need to be made, when evaluating and establishing the discounts for specific customers. The consideration of additional discounts on distribution rates (e.g., for new or incremental load for service in a distressed or environmental justice community) stimulated the Company's consideration of what costs due to discount are supported by other customers, and of what consideration should be given in setting the level of discount to address the incremental costs (e.g., relative to what is recovered through discounted distribution rates) that may be incurred or required to interconnect and serve a customer's incremental or new load, such that cost shifting to other customers is avoided, and to provide any contribution toward the cost of service on the system that positively benefits all customers utilizing that system.

Additional details of this process are to be established; however, this aspect of the Company's proposal highlights the need to work with a given applicant to determine the level of discount, rather than have a standardized, fixed discount, for each specific customer, and ultimately as required in the UI EDR, promulgate the discount level and detailed terms of service under a service agreement. Also within the requirements reviewed and such agreement for the UI EDR is the requirement for a customer to meet and maintain performance milestones. Up front, a customer states its plan and the load it adds that would be afforded a discount under the EDR. The load a customer plans to add becomes the basis for what a customer would be required to achieve, and of the consequences of not meeting and potentially having to repay discounts provided.

Regarding scope, the UI EDR also informed minimum load levels; eligibility (e.g., targeting growth and stimulation that encourages businesses to bring in new service or expand existing facilities within the Company's service area that bring new capital, jobs, and incremental electric load into the regional economy; exclusion of local businesses); and whether potential caps are needed. Additionally, the requirement under the UI EDR of mandatory participation in clean energy or energy-efficiency programs informed the Company's EDR of the need for load management, by actively integrating efficiency or clean power measures rather than simply adding unmanaged load.

b. and c. The Company's reference to "Docket No. 28-08-08" is a typographic error; the correct docket reference should be to UI's rate case in Docket No. 22-08-08.

Date Filed: November 09, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

In its responses to OCC-459, OCC-929, OCC-930, and OCC-931, the Panel provided additional information regarding how the EDR in its direct testimony should be implemented. Explain in detail why the Panel did not include this information in its direct testimony.

Response:

The Company cannot anticipate all aspects of information that other parties may find of interest when preparing its rate application. The whole process of the rate proceeding is to collaborate with other parties to evaluate an investigate the Company's proposals and that Company sees the discovery process as a critical phase that helps to develop the areas of interest for various parties and intervenors.

In addition, please refer to the Company's prefiled testimony, Exhibit CLP-RATES-1, where the Company has provided its proposed EDR rider and discussed the various aspects of its EDR proposal. In that testimony the Company explained more detailed and implementation-related aspects of its proposal such as qualifying criteria, enrollment and service agreement requirements are subject to further development. For example, the Company stated the following: "As filed the EDR is preliminary and subject to further amendment as the specific functional aspects of the rider are developed (e.g., qualification or form and applicability of pricing discounts)." (Exhibit CLP-RATES-1, page 24, at 7-9). The Company also stated: "The Company requests though this proceeding for PURA to help facilitate[e] further development of qualifying criteria for its proposed EDR." (Exhibit CLP-RATES-1, page 26, at 5-7).

Date Filed: November 09, 2026

Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman
Request from: Connecticut Industrial Energy Consumers

Question:

In its response to OCC-929, the Panel states that Eversource "anticipates a written commitment and demonstrated achievement of added jobs and capital investments within the Company's service area, commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR."

a. Explain in detail how Eversource would determine if the number of added jobs and/or capital investment is "commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR."
b. Is the Panel proposing that a customer must commit to adding a specific number of jobs as a condition of eligibility for the EDR? If the answer is in the affirmative, specify the minimum number of jobs that would have to be added.
c. Is the Panel proposing that a customer must commit to investing a specific amount of capital as a condition of eligibility for the EDR? If the answer is in the affirmative, specify the minimum level of capital investment that would be necessary.

Response:

In its response to OCC-929[i], the Panel states that Eversource "anticipates a written commitment and demonstrated achievement of added jobs and capital investments within the Company's service area, commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR."

a. The Company does not propose a numeric test for jobs or capital investment. The economic test for eligibility is whether the new or expanded load will produce revenue above the incremental cost of serving it over the term of the discount, as described in the Company's responses to OCC-458[ii] and OCC-459[iii]. The written commitment referenced in OCC-929 serves a different purpose in that it documents that the facility receiving the discount is a new or expanded operation of the kind the rate is intended to attract, rather than a reclassification of existing load. "Commensurate" means that the jobs and investment the customer represents are consistent with the size and nature of the facility

described in its application, for example that a customer applying for the discount on the basis of a new production line represents the staffing and equipment that line entails.

The Company is cognizant that PURA had previously declined to approve UI's initial proposed EDR that had tiered discount levels based on specific thresholds of capital investment and increased employee headcount.

b. No, the Company does not propose a minimum number of added jobs as a condition of eligibility. However, the Company does intend to ask as part of the EDR application for historical employee headcount and any expected new headcount, similar to the current UI application. The reasoning for the questioning is to ensure that customers taking advantage of the EDR are providing benefits to Connecticut but without necessarily requiring a minimum level of headcount increases or capital investment.

c. No, the Company does not propose a minimum level of capital investment as a condition of eligibility. However, the Company does intend to ask as part of the EDR application for expected capital investment, similar to the current UI application. The reasoning for the questioning is to ensure that customers taking advantage of the EDR are providing benefits to Connecticut but without necessarily requiring a minimum level of headcount increases or capital investment.

Prior Referenced Responses:

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[i] OCC-929 Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26. Please explain the standards the Company will use to determine that a customer's project provides sufficient economic value, including job creation and capital investment, to qualify for the EDR.

OCC-929 Response:

The Company anticipates a written commitment and demonstrated achievement of added jobs and capital investment within the Company's service area, commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR. The Company is also reviewing the requirements and documentation set forth as part of UI's current EDR program, pursuant to UI's rate case in Docket No. 28-08-08. Details of these and other standards are yet to be developed.

[ii] OCC-458 Question:

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 23, which states that "a schedule of discounted rates would be determined on a customer-specific basis," and at 28, which states that the Company's proposed approach would avoid "administrative complexity associated with variable or negotiated discounts."

a. Please reconcile these two statements.
b. Clarify which components of the EDR would be customer-specific, and which components would be consistent across different EDR customers.
c. Has it previously been the practice of the Company to negotiate discounts with customers on an individual basis? If so, does the EDR mirror the structure of those discounts? If not, why did the Company propose to change the structure?

OCC-458 Response:

a. The intended approach combines boundaries that provide structure with room for customer-specific decisions. This allows for reduced administrative complexity while acknowledging that there are unique customer situations. The Company expects to establish specific discounts within the time frame that are above marginal cost of service for that customer. This approach will include a specific schedule providing guidelines and boundaries within which to work in developing a discount.

b. The overarching rate structure is assumed to be the same for all customers within a given class, and discounts or other adjustments under the EDR would be made relative to such rates, for incremental, new load. The primary focus is on discounts to the distribution component of service, and any other component that can be demonstrated to provide a positive net benefit to all customers, justifiable and allowable within the context of such component. The characteristics, cost of providing service and nature of service and unique circumstances of an individual customers provide the basis for determining the type and extent of rate discount that may be applied, and the extent in additional revenue that can be credited to and demonstrated to be a benefit to all customers. Evaluation for an individual customer to design and verify benefits would occur initially and on an ongoing basis (e.g., annually).

c. Yes, it has previously been the practice of the Company to negotiate discounts with customers on an individual basis, particularly where actual customer cost to serve and unique characteristics of that customer need to be evaluated. Customer specific details including determination of the incremental load to which the EDR applies, level and schedule of discounts, and other parameters are set forth in individual customer service agreements.

[iii] OCC-459 Question:

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, which states that the EDR discount would be "anchored to the Company's marginal cost of service."

a. Please explain the methodology for calculating this cost on a per-customer basis. Provide any associated workpapers in live Excel format with all formulas intact.
b. How often does the Company plan to conduct this calculation or other analysis to confirm that revenues collected from each EDR customer are sufficient to recover their incremental cost of service?

OCC-459 Response:

a. As a working proposition, the Company has conducted and provided as part of its filing, a marginal distribution cost study, which provides several components of marginal distribution costs that, at a system level, can inform the marginal distribution costs of customers within each service class (e.g., large C&I). When individual customer load growth or new service connections are evaluated, the Company would conduct a customer-specific analysis of service requirements and costs, including for upgrades and service interconnection requirements. Both local facilities (e.g., service transformers, services, switchgear) and system level costs (e.g., circuits, substations) are evaluated and where capital costs may be incurred, a contribution in aid of construction and rate revenue sufficiency analysis would be performed. The expected revenue from Distribution rates becomes part of this evaluation, and discounts from otherwise applicable rates that are above marginal costs can have an impact, as it relates to such individual customer revenues (i.e., on a per customer basis, for such customer).

b. Such calculation or analysis would conceivably be performed any time the need to serve incremental or new load is evaluated. The impact of potential discounted rates would be a factor in these analyses.

Date Filed: November 09, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

With reference to the Panel's response to OCC-457, does the Panel agree that a customer can be eligible for the EDR even if the new or incremental load that receives the incentive does not result in material "downward pressure on rates" for all customers? Explain your response in detail and, if the Panel does not agree, specify the minimum reduction in rates for all customers that the Panel is proposing to adopt as a condition on EDR eligibility.

Response:

The Company anticipates that review of an application for participation in the EDR would include an evaluation and establishment of a level of discount designed to achieve a positive contribution in revenue that effects a downward pressure on distribution rates to all customers. Please also refer to the Company's response to OCC-459[i]. While characterizing whether such outcome is "material" is subjective, the extent of downward rate pressure achieved and how it should be characterized may only be determined after the fact.

Prior Referenced Response

[i] OCC-459 Question:

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, which states that the EDR discount would be "anchored to the Company's marginal cost of service."

a. Please explain the methodology for calculating this cost on a per-customer basis. Provide any associated workpapers in live Excel format with all formulas intact.
b. How often does the Company plan to conduct this calculation or other analysis to confirm that revenues collected from each EDR customer are sufficient to recover their incremental cost of service?

OCC-459 Response:

a. As a working proposition, the Company has conducted and provided as part of its filing, a marginal distribution cost study, which provides several components of marginal distribution costs that, at a system level, can inform the marginal distribution costs of customers within each service class (e.g., large C&I). When individual customer load growth or new service connections are evaluated, the Company would conduct a customer-specific analysis of service requirements and costs, including for upgrades and service interconnection requirements. Both local facilities (e.g., service transformers, services, switchgear) and system level costs (e.g., circuits, substations) are evaluated and where capital costs may be incurred, a contribution in aid of construction and rate revenue

sufficiency analysis would be performed. The expected revenue from Distribution rates becomes part of this evaluation, and discounts from otherwise applicable rates that are above marginal costs can have an impact, as it relates to such individual customer revenues (i.e., on a per customer basis, for such customer).

b. Such calculation or analysis would conceivably be performed any time the need to serve incremental or new load is evaluated. The impact of potential discounted rates would be a factor in these analyses.

Date Filed: November 09, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

With reference to the Panel's response to OCC-464, explain whether:

a. The term "large-scale computational loads" includes only data centers, or if it also may be applied to other non-residential loads.

b. There are specific criteria that Eversource uses to define what constitutes a "data center"? If the answer is in the affirmative, provide and explain the criteria.

Response:

a. The Company's response relied on "data center" as the context for what is meant by the term "large scale computational load" referred to.

b. There may be many different types of customers and loads whose characteristics fall within the classification of a data center. The State of Connecticut's Office of Legislative research report, "Data Center Energy Impacts and State Responses" refers to a description of a data center as, generally, "a physical facility that houses and runs large computer systems." The report further provides: "A data center typically contains multiple computer servers, data storage devices, and network equipment to store, manage, process, and transmit large amounts of data". [1] The term "large-scale" provides additional specificity regarding what might be attributable to a specific data center. As stated in response to OCC-464, the Company believes the appropriate treatment of such loads, including whether a specific rate or customer-specific terms are warranted should be determined through deliberations with state agencies when that load materializes.

[1] "Data Center Energy Impacts and State Responses", Connecticut General Assembly, Office of Legislative Research, 2025-R-0164, Mary Fitzpatrick, October 14, 2025.

Date Filed: November 09, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Connecticut Industrial Energy Consumers

Question:

The Panel stated in its response to OCC-930 that "[t]he requirements set forth as part of the decision and EDR implemented pursuant to UI's rate case in PURA Docket No. 28-08-08 provide another basis for regulatory objective standards applicable to the Eversource EDR."

Does the Panel agree that the EDR for new and incremental load, and the special contract policy for load retention, that PURA approved for UI implementation in Docket Nos. 22-08-08 and 24-10-04 provide a basis for regulatory objective standards applicable to the Eversource EDR? If the answer is in the affirmative, identify the standards from Docket Nos. 22-08-08 and 24-10-04 that are applicable to the Eversource EDR and specify how they are reflected in the EDR proposed by the Panel. If the answer is in the negative, explain why the PURA decisions issued in Docket Nos. 22-08-08 and 24-10-04 do not provide such basis.

Response:

Please refer to the Company's response to CIEC-031[i], specifically subparts b. and c.

The EDR for new and incremental load approved by PURA for UI implementation in Docket Nos. 22-08-08 and 24-10-04 provide a basis of comparison for the standards and the framework upon which the Eversource proposed EDR, for new and incremental load, was developed. Please refer to the Company's response to CIEC-031, subpart a. Special contracts and load retention are outside the scope of the Company's EDR proposal, and the Company has not proposed changes to its special contract practice in this proceeding.

Prior Referenced Response

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[i] CIEC-031 Question:

With reference to the Company's response to OCC-929:

a. Did the Panel review the "requirements and documentation set forth as part of UI's current EDR program" when developing the proposal it advanced in this proceeding for an economic development rate ("EDR") incentive? If the answer is in the affirmative, explain how such review informed the Panel's proposals. If the answer is in the negative, explain why the Panel did not review that information.

b. Specify the basis on which Eversource anticipates that UI will file a new rate case in 2028.

c. Explain in detail information regarding the UI EDR that the Panel anticipates reviewing in Docket No. 28-08-08. Include in your response an explanation of why information that a different utility might file in a future rate proceeding is relevant to the development of an EDR for certain Eversource customers in this proceeding.

CIEC-031 Response:

a. Yes. The Company's review of UI's EDR program requirements and documentation, and the basis upon which that EDR was developed, informed the purpose, scope and framework of the Company's proposed economic development incentive rate. Conceptually, the UI EDR offers a rate incentive by temporarily discounting distribution rates, which lowers operating costs for participating business customers. Structurally, the UI EDR provides an economic incentive by applying the distribution rate discount and thereby financial relief for electric service to eligible new or expanding loads, over a five-year term. Establishing a schedule of discounts provides these businesses with predictable, reduced overhead during the early growth or expansion phases of operations.

Although the Company has indicated there are details that are under development with regard to its proposal, the UI EDR further informed the Company regarding considerations regarding having a standard or modified discount schedule, still within a five-year term, that need to be made, when evaluating and establishing the discounts for specific customers. The consideration of additional discounts on distribution rates (e.g., for new or incremental load for service in a distressed or environmental justice community) stimulated the Company's consideration of what costs due to discount are supported by other customers, and of what consideration should be given in setting the level of discount to address the incremental costs (e.g., relative to what is recovered through discounted distribution rates) that may be incurred or required to interconnect and serve a customer's incremental or new load, such that cost shifting to other customers is avoided, and to provide any contribution toward the cost of service on the system that positively benefits all customers utilizing that system.

Additional details of this process are to be established; however, this aspect of the Company's proposal highlights the need to work with a given applicant to determine the level of discount, rather than have a standardized, fixed discount, for each specific customer, and ultimately as required in the UI EDR, promulgate the discount level and detailed terms of service under a service agreement. Also within the requirements reviewed and such agreement for the UI EDR is the requirement for a customer to meet and maintain performance milestones. Up front, a customer states its plan and the load it adds that would be afforded a discount under the EDR. The load a customer plans to add becomes the basis for what a customer would be required to achieve, and of the consequences of not meeting and potentially having to repay discounts provided.

Regarding scope, the UI EDR also informed minimum load levels; eligibility (e.g., targeting growth and stimulation that encourages businesses to bring in new service or expand existing facilities within the Company's service area that bring new capital, jobs, and incremental electric load into the regional economy; exclusion of local businesses); and whether potential caps are needed. Additionally, the requirement under the UI EDR of mandatory participation in clean energy or energy-efficiency programs informed the Company's EDR of the need for load management, by actively integrating efficiency or clean power measures rather than simply adding unmanaged load.

b. and c. The Company's reference to "Docket No. 28-08-08" is a typographic error; the correct docket reference should be to UI's rate case in Docket No. 22-08-08.