Date Filed: October 27, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Denise Cosentino
Request from: Public Utilities Regulatory Authority

Question:

(AC-INSURANCE EXPENSE) Application, Sch, WPC- 3.19. Explain what the following insurance coverages are, what each policy covers, and why each is needed for the provision of utility services.

a. Accrual for Uncollectible Claims;
b. Public Liability Expense;
c. General Liability;
d. All Risk Property/Boiler & Machine;
e. Privacy Protection; and
f. Fiduciary.

Response:

a. The accrual for uncollectible claims is a reserve against damage to the Company's infrastructure such as poles and underground lines by third parties. The third parties are billed for the costs to repair and this accrual accounts for the uncollectible portion of the amount billed. The Company estimates the likelihood of recovery through the third party's insurance, settlement, legal action, or other means, and books a reserve adjustment against the receivable. By pursuing the third party who caused the damage for the associated costs to repair, the costs are transferred away from customers.

b. The Company maintains a reserve for general liability claims within the self-insurance retention that the Company becomes legally obligated to pay. The accrual expense associated with this reserve provides a smoothing effect on the cost to customers related to such claims. An actuary reviews the balance in the Company reserve each year for adequacy and the expense is the steady addition of funds to cover claims.

c. General Liability insurance covers third party claims the company becomes legally obligated to pay. Maintaining this insurance transfers the risk of paying claims over the self-insurance retention away from customers. For example, in 2016, the Company settled a wrongful death case for $5 million and insurance paid for all costs over $1 million. The $1 million came from the public-liability reserve.

d. All Risk Property/Boiler & Machine covers physical losses to insurable property owned, used, or leased by the Company from covered perils. Property insurance transfers the risk of repairing/replacing damaged insurable infrastructure away from customers.

e. Privacy Protection covers breaches of networks and operational technology including investigation, remediation and credit monitoring. Maintaining this insurance transfers the risk of costs associated with a cyber breach that exceeds self-insurance retention away from customers.

f. Fiduciary Liability covers breach of responsibilities, obligations or duties by a fiduciary of any named benefit program sponsored by the Company such as the pension and 401k. Fiduciary insurance protects the benefit plans that are an important piece to retaining workers who provide utility services.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(AC-BANK AND DEBT SERVICE CHARGES) Interrog. Resp. RRU-10, Att. 4, p.1.

a. Explain why the Rating Agency Surveillance fee increased by 13.85% in 2024 compared to 2023.
b. Explain why the Rating Agency Surveillance fee increased by 12.37% in 2025 compared to 2024.

Response:

Rating agency surveillance fees are fees charged by S&P, Moody's and Fitch for their ongoing rating and monitoring of CL&P. Surveillance fees help rating agencies continuously assess the creditworthiness of a company, which can change over time due to various factors. This includes ongoing review of the Company's regulatory environment, financial performance, operations, and evaluating new developments that could impact the Company's credit quality.

In exchange for paying these surveillance fees, S&P, Moody's and Fitch provide credit ratings on CL&P. Absent paying these fees, S&P, Moody's and Fitch would not provide credit ratings. CL&P's credit ratings play a critical role in the Company's ability to attract least cost debt capital. Not paying these fees, and in turn, not maintaining credit ratings, would be extremely detrimental to CL&P's customers.

Rating agency surveillance fees are allocated to Eversource Energy and its subsidiaries rated by S&P, Moody's and/or Fitch on a pro rata basis based on the amount of debt outstanding at each entity. The increase in fees identified in parts (a) and (b) are driven by: (1) an increase in the absolute level of fees charged; and (2) an increase in the allocation to CL&P based on CL&P having a larger proportionate share of outstanding debt.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(AC-BANK FEES AND DEBT SERVICE CHARGES) Interrog. Resp. RRU-10 Att. 3, p. 1. Explain why the Bank Service charges for Work Order TFEE0011 increased by 26% in the Test Year compared to 2024.

Response:

The Bank Service charges increase in 2025 for Work Order TFEE0011 is attributable to year-over-year increase in each fee structure and a new service offering in 2025 by JPMorgan Chase. Please refer to RRU-089, Attachment 1, for the year-over-year analysis for each fee structure and new service offerings in the test year.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(AC-CUSTOMER DEPOSITS) Application, Sch. B-9. Confirm if the balance of Customer Deposits will remain same for the Test Year and the Rate Year. Provide a detailed explanation and any supporting workpapers demonstrating how the Rate Year balance was derived.

Response:

The Company's proposal is that the balance of Customer Deposits stated within Exhibit CLP-REVREQ-2, of $10,881,000 will remain the same for the Test Year and the Rate Year. Therefore, the Rate Year balance is a direct derivation of the Test Year amount as of December 31, 2025. The Company could not reasonably estimate the amount of non-residential security deposits collected through the Rate Year and relied on the Test Year balance as a reasonable level of customer deposits to reflect in the rate base and in the cost of service.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-REVREQ-2, Schedule WP C-3.36, p. 2; Application, Ex. CLP-REVREQ-2 Schedule WP C-3.13. Describe whether any costs related to complex environmental remediation sites have ever been included in the Company's O&M expense item for environmental remediation shown in schedule C-3.13.

Response:

Please refer to the Company's response to RSR-037[i] for the justification for deferring complex environmental site costs; the Company's response to OCC-854[ii] for discussion of the environmental O&M expense requested in this proceeding; and OCC-061[iii] for the regulatory proceedings authorizing recovery of environmental remediation costs.

Prior Referenced Responses

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[i] RSR-037 Question:

(ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 34–35. Regarding Site #103 Parsons Lane Durham Mineral Oil Dielectric Fluid Release:

a. Provide a copy of the settlement agreement;
b. Provide the total portion of project costs recovered through the settlement agreement and the portion of costs requested for recovery in this proceeding;
c. Explain why these costs are recovered through the deferred accounting mechanism rather than as a routine environmental remediation cost; and
d. Describe why the utility pole failed and provide the age of the pole at the time of failure.

RSR-037 Response:

a. Please refer to RSR-037, Attachment 1 CONFIDENTIAL, for a copy of the settlement agreement.

b. Please refer to RSR-037, Attachment 2 CONFIDENTIAL, for the requested information.

c. As noted in the testimony in Exhibit CLP-ENV-1 of Marc J. Richards, Gary A. Iadarola, and Clare B. Connolly, the sequence, timing, and magnitude of response activities can vary from site to site depending upon the size of the site, the degree of contamination, nearby sensitive receptors, land ownership, the degree of oversight and control exercised by regulators, and many other site-specific factors. These dynamic circumstances, on-site conditions and state and municipal requirements or expectations speed projects up or slow projects down, impacting not only timing but cost. All of these variables make it extremely difficult to

accurately forecast the level of expense to be incurred in a year and cause significant fluctuations year-over-year in the level of expense incurred. Therefore, these costs do not fit well with traditional base rate recovery which is designed to establish base distribution rates based on expected future levels of annual costs. The variability in these environmental remediation costs drives the need for the continuation of deferral treatment. This request is not a blank check, but rather a treatment that requires the Company to meet the burden of a prudence review on its environmental remediation costs in the next rate case.

d. The pole was installed in 1962. The reason for failure is unknown.

[ii] OCC-854 Question:

(Environmental Remediation) Per a footnote in Settlement Agreement Attachment 3, in Docket Number 17-10–46, the Company was allowed $2.289 million for environmental O&M expenses in Rate Year 1, $2.381 million in Rate Year 2, and $2.467 million in Rate Year 3.

a. Were the O&M expenses incurred in the prior rate plan's Rate Years of a similar nature to the $1.93 million requested in the current rate application? Explain.
b. Were there any environmental remediation costs being deferred prior to the time of the last rate case?
c. If yes, indicate the amounts deferred annually.
d. Were there any deferred environmental remediation costs being amortized or recovered prior to the time of the last rate case?
e. Were there any deferred environmental remediation costs being amortized/recovered and as a result of the approved settlement agreement in Docket No. 17-10-46?
f. If yes, indicate the amounts amortized or recovered annually.

OCC-854 Response:

a. Yes. As shown on WP C-3.13 of the Company's July 14, 2026, filing in this docket, the categories of cost that make up the $1.93 million requested in the current rate application include: (1) Clean Up & Disposal of Waste Material; (2) Manholes & Vaults; (3) Licensing & Permitting; and (4) Environmental Outside Services. There was also a fifth category, Reserve Site Remediation, but a pro forma adjustment removed the costs associated with this category that were related to reserve adjustment accruals associated with new environmental sites.

The environmental O&M expenses included in Docket No. 17-10-46 were presented in the Company's November 22, 2017, filing WP C-3.8, page 1 of 3, in categories identified as: (1) Overhead Environmental Cleanup; (2) Underground; (3) Environmental – Other; (4) Maintenance of Property Units; (5) Substation; and (6) Maintenance of Str. Lighting Equipment. Despite the differences in categories in each of the filings, the dollars that make up the costs in each filings' Environmental schedule were identified using the same cost elements from the Company's Powerplan cost repository, with two exceptions. First, there was one additional cost element for Compliance Assistance-Fees-Plans included in Environmental in the 2017 filing that was included in the Field Operations (Overhead Lines) and Residual schedules in the current filing (the Test Year amount in the 2017 filing was $28,382 and the Test Year amounts in the current filing were $5,795 in the Field Operations (Overhead Lines) schedule and $11,924 in the Residual schedule, for a total of $17,719). Second, the cost element for Reserve Site Remediation in the 2017 filing in the amount of $79,082 was not removed from the Environmental schedule using a pro forma adjustment the way it was removed in the current rate application.

b-d.

No. As explained in the November 22, 2017, testimony of Company witnesses Catherine Finneran and Timothy Griffin in Docket No. 17-10-46, there was no current recovery from customers for environmental investigation and remediation costs at the time of the last rate case. Between 1998 and 2003, with small amounts received through 2013, the Company had pursued and achieved recoveries of $15.170 million for environmental investigation and remediation costs from several of the Company's historical insurance carriers and a third party. Because the Company had not recovered expenses for environmental investigation and remediation costs in electric rates, in essence it had used these recoveries to pay for the Company's investigation and remediation of its environmental liabilities, including manufactured gas plants (MGPs) and other Company sites. By the end of September of 2017 (just prior to the filing of the Company's rate case in November 2017), the Company spent $8.4 million with an additional $4.9 million recorded to the environmental liability that was charged to shareholders via a "below the line" account. Therefore, the Company was $1.9 million away from spending or charging to shareholders an amount equal to the proceeds received.

e.-f.

No, as demonstrated in the March 29, 2018, Settlement Amendment Update to Settlement Agreement Attachment 5, Other Amortization Expense, there were no deferred environmental remediation costs being amortized/recovered as a result of the approved settlement agreement in Docket No. 17-10-46.

[iii] OCC-061 Question:

(Environmental Remediation) Identify all other proceedings by Company name and docket number in which the Company requested recovery of environmental remediation costs other than through operating expenses (e.g., regulatory asset, tracker, etc.).

OCC-061 Response:

As an example, the Company's legal counsel has informed the Company of the following proceeding and outcomes:

Importantly, Section 8 of the 2018 Rate Settlement approved by PURA in Docket No. 17-10-46, Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend Rate Schedules, states "Environmental remediation costs shall be recovered as follows: (i) The Company shall be allowed to recover its environmental remediation costs in accordance with the proposal described in the Application; and (ii) **the Company is authorized to track and defer environmental costs for future review and recovery in each subsequent rate case.**

Date Filed: November 03, 2026

Witness: David L. Gladey, Lavelle Freeman, John P. Dipaola-Tromba, Jennifer A. Schilling and Elli Ntakou
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Exhibit CLP-REVREQ-2, Schedule WP C-3.16. Explain whether the Company anticipates any cost savings from the Targeted System Performance (TSP) plan, and whether these savings are reflected in the Rate Year. Provide details on how those cost savings, if any, will be realized and in what projected dollar amounts.

Response:

The Company anticipates that Targeted System Performance ("TSP") plan investments will deliver significant reliability, resiliency, and operational benefits by improving system performance, expanding capacity to support future growth, addressing aging infrastructure, and reducing the frequency and duration of customer outages. While certain investments may provide near-term operational efficiencies, the majority of the benefits associated with the TSP plan are expected to be realized over multiple years as projects are completed, system improvements are fully integrated into the electric grid, and the impact of the investments are manifested over time.

For substation-related investments, project schedules often involve extensive engineering, permitting, and long lead-time material procurement. As a result, many of the anticipated reliability and capacity benefits will not be fully realized during the Rate Year. These investments are primarily intended to support long-term system performance, reliability, and economic development needs rather than generate immediate operating expense reductions. However, planning for the orderly, economic expansion of the system potentially reduces costs that might be incurred responding to unplanned outages or emergency events due to lack of capacity.

Similarly, the primary objective of the Company's resiliency investments is to harden vulnerable portions of the system to improve performance and reduce the impacts of severe weather events. Although the Company does not anticipate material, quantifiable operating expense reductions in the Rate Year associated with these investments, its analysis indicates that the proposed resiliency plan is expected to reduce customers interrupted and customer minutes of interruption during an average of approximately 40 storm-related outage events annually. This reduction in outage exposure is estimated to lower storm response and restoration costs by approximately $450,000 per year. In addition, the Company estimates annual customer reliability benefits, measured using Value of Lost Load ("VOLL"), of approximately $37 million. These benefits represent avoided

customer interruption impacts and improved service reliability due to resiliency plan investments, rather than direct reductions in Company operating expenses.

For distribution system investments, including feeder and infrastructure replacement projects, the Company expects long-term operational benefits through improved asset condition, reduced equipment failures, and enhanced operational flexibility. As aging infrastructure is proactively replaced and system conditions improve, the Company anticipates a reduction in emergent events, unplanned corrective maintenance activities, and associated operating costs. However, the timing and magnitude of these benefits depend on several factors, including asset condition, weather impacts, and actual system performance. The full value of these investments is expected to be realized over multiple years as the cumulative effects of increased proactive infrastructure replacement and system improvements are achieved.

Date Filed: November 03, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Exhibit CLP-REVREQ-2, Schedule WP C-3.17. Explain whether the Company anticipates any cost savings from the TSP plan, and whether these savings are reflected in the Rate Year. Provide details on how those cost savings, if any, will be realized and in what projected dollar amounts.

Response:

Please refer to the Company's response to RSR-047[i].

Prior Referenced Response:

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[i] RSR-047 Question:

(EXPENSES) Exhibit CLP-REVREQ-2, Schedule WP C-3.16. Explain whether the Company anticipates any cost savings from the Targeted System Performance (TSP) plan, and whether these savings are reflected in the Rate Year. Provide details on how those cost savings, if any, will be realized and in what projected dollar amounts.

RSR-047 Response:

The Company anticipates that Targeted System Performance ("TSP") plan investments will deliver significant reliability, resiliency, and operational benefits by improving system performance, expanding capacity to support future growth, addressing aging infrastructure, and reducing the frequency and duration of customer outages. While certain investments may provide near-term operational efficiencies, the majority of the benefits associated with the TSP plan are expected to be realized over multiple years as projects are completed, system improvements are fully integrated into the electric grid, and the impact of the investments are manifested over time.

For substation-related investments, project schedules often involve extensive engineering, permitting, and long lead-time material procurement. As a result, many of the anticipated reliability and capacity benefits will not be fully realized during the Rate Year. These investments are primarily intended to support long-term system performance, reliability, and economic development needs rather than generate immediate operating expense reductions. However, planning for the orderly, economic expansion of the system potentially reduces costs that might be incurred responding to unplanned outages or emergency events due to lack of capacity.

Similarly, the primary objective of the Company's resiliency investments is to harden vulnerable portions of the system to improve performance and reduce the impacts of severe weather events. Although the Company does not anticipate material, quantifiable operating expense reductions in the Rate Year associated with these investments, its analysis indicates that the proposed resiliency plan is expected to reduce the customers interrupted and customer minutes of

interruption during an average of approximately 40 storm-related outage events annually. This reduction in outage exposure is estimated to lower storm response and restoration costs by approximately $450,000 per year. In addition, the Company estimates annual customer reliability benefits, measured using Value of Lost Load ("VOLL"), of approximately $37 million. These benefits represent avoided customer interruption impacts and improved service reliability due to resiliency plan investments, rather than direct reductions in Company operating expenses.

For distribution system investments, including feeder and infrastructure replacement projects, the Company expects long-term operational benefits through improved asset condition, reduced equipment failures, and enhanced operational flexibility. As aging infrastructure is proactively replaced and system conditions improve, the Company anticipates a reduction in emergent events, unplanned corrective maintenance activities, and associated operating costs. However, the timing and magnitude of these benefits depend on several factors, including asset condition, weather impacts, and actual system performance. The full value of these investments is expected to be realized over multiple years as the cumulative effects of increased proactive infrastructure replacement and system improvements are achieved.

Date Filed: November 05, 2026

Witness: Craig Dikeman and Matthew J. Correia
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Exhibit CLP-REVREQ-2, Schedule WP C-3.17. Regarding the Test Year Field Operations – Underground Lines O&M expense:

a. Provide contract agreements between contractors and CL&P for underground line maintenance operations that were in place during the test year.

b. Provide contract agreements between vendors and CL&P for underground line maintenance operations that are currently in place or that will be in place in the rate year.

c. State whether competitive bidding was utilized for selecting the contractors.

d. If competitive bidding was utilized, provide a copy of the Company's competitive solicitation, all bids received, and any internal bid review and selection documentation.

e. If competitive bidding was not utilized, explain why the Company did not utilize competitive bidding for purposes of making contracting decisions.

Response:

a. Please refer to RSR-049, Attachment 1, for a listing of contracts between CL&P and contractors for underground line maintenance operations that were in place during the Test Year. Due to the magnitude of this request, the Company has provided the subset of contracts associated with the highest level of Test Year expense. This contract subset represents approximately 90% of the test-year expense. If PURA needs additional contracts, the Company will provide additional contracts upon request.

b. Please refer to RSR-049, Attachment 1 for a listing of contracts between CL&P and contractors for underground line maintenance operations. The column labeled "End Date" contains the end date of each agreement and indicates whether the agreement is currently in place or is expected to remain in place during the Rate Year.

c. Please refer to the "Contract Category" column in RSR-049, Attachment 1, which indicates whether competitive bidding was utilized in selecting each contractor.

d. Please refer to RSR-049, Attachment 1. The columns "RSR-049 Attachment" and "RSR-049 Page Number" identify the location of the applicable competitive solicitation and accompanying bid evaluation. Please refer to RSR-049, Attachment 2 CONFIDENTIAL, for

the competitive solicitations and bid evaluations associated with the contracts listed in Attachment 1.

Certain competitive solicitations generated a significant volume of supplier proposals and supporting bid documentation. To provide a reasonable documentation submission, RSR-049 Attachment 2 does not include all supplier proposals and supporting bid documentation associated with those solicitations. The Company will provide the supplier proposals and other supporting bid documentation associated with the solicitations identified in RSR-049 Attachment 1, upon request.

e. All contracts included in RSR-049 Attachment 1, which collectively represent approximately 90% of the Test Year expense, were awarded through a competitive bidding process. Accordingly, no Sole Source Justifications are applicable to the contracts included in this production.

Date Filed: November 09, 2026

Witness: Craig Dikeman and Matthew J. Correia
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Exhibit CLP-REVREQ-2, Schedule WP C-3.16. Regarding the "Field Operations – Overhead Lines" Test Year expenses:

a. Provide contract agreements between contractors and CL&P for overhead line maintenance operations.
b. Provide contract agreements between vendors and CL&P for overhead line maintenance operations that are currently in place or that will be in place in the Rate Year.
c. State whether competitive bidding was utilized for selecting the contractors.
d. If competitive bidding was utilized, provide a copy of the Company's competitive solicitation, all bids received, and any internal bid review and selection documentation.
e. If competitive bidding was not utilized, explain why the Company did not utilize competitive bidding for purposes of making contracting decisions.

Response:

a. Please refer to RSR-050, Attachment 1, for a listing of contracts between CL&P and contractors for overhead line maintenance operations that were in place during the Test Year. Due to the size of the request, the Company has provided the subset of contracts associated with the highest level of Test Year expense. This contract subset represents approximately 90% of the Test Year expense, if additional contracts are needed the company will provide them upon request.

b. Please refer to RSR-050, Attachment 1, for a listing of contracts between CL&P and contractors for overhead line maintenance operations. The column labeled "End Date" contains the end date of each agreement and indicates whether the agreement is currently in place or is expected to remain in place during the Rate Year.

c. Please refer to the "Contract Category" column in RSR-050, Attachment 1, which indicates whether competitive bidding was utilized in selecting each contractor.

d. Please refer to RSR-050, Attachment 1. The Columns "RSR-050, Attachment", "RSR-050, Page Number", "RSR-049, Attachment", "RSR-049, Page Number" identify the location of the applicable competitive solicitation and accompanying bid evaluation or Sole Source Justification documentation. Please refer to RSR-050, Attachment 2 CONFIDENTIAL,

and RSR-049, Attachment 2 CONFIDENTIAL, for the competitive solicitations and bid evaluations or Sole Source Justifications associated with the contracts listed in RSR-050, Attachment 1.

Certain competitive solicitations generated a significant volume of supplier proposals and supporting bid documentation. To provide a reasonable documentation submission, RSR-050, Attachment 2 does not include all supplier proposals and supporting bid documentation associated with those solicitations. The Company will provide the supplier proposals and other supporting bid documentation associated with the solicitations identified in RSR-050, Attachment 1 upon request.

e. The majority of contracts included in RSR-050, Attachment 1, which collectively represent approximately 90% of the Test Year expense, were awarded through a competitive bidding process. Two contracts listed within RSR-050, Attachment 1, were procured through Sole Source Justifications. Please refer to the applicable Sole Source Justifications included in RSR-050, Attachment 2 CONFIDENTIAL, for the documented reasons competitive bidding was not utilized for those contracts.

Date Filed: October 27, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Interrog. Resp. OCC-375(b). Provide the following:

a. All written policies or documentation regarding the Company's shift to significantly reduce the number of contractor dock crews working on the system;
b. The average annual number of contractor dock crews separately for years 2023-2025; and
c. The predicted annual average number of contractor dock crews for 2026 and 2027.

Response:

a. As part of the Company's 2016 contract with IBEW Locals 420 and 457 (referred to as "Teal Book") the Response Specialist Organization (RSO) was formed between 2016 and 2017. At this time, 100 linemen were moved from the Area Work Centers (AWC) to staff the RSO group. The Company's attempts to fill these journeymen linemen roles externally were unsuccessful. Consequently, the only way to increase lineworker staffing was to hire non-qualified employees to enter and complete the four-year apprenticeship program to become journeyman lineworkers. The Teal Book contract negotiation in 2019 increased the RSO staffing by an additional 26 lineworkers. These transitions of linemen from the AWCs to RSO left the AWCs with insufficient internal resources to complete their work. Thus, the Company hired contractor dock crews to supplement the internal workforce to complete necessary work until the newly hired employees finished their apprenticeships and became qualified lineworkers. As the hires completed their apprenticeships and the AWCs began to take on more work on their own, the Company reduced and then subsequently eliminated the contractor dock crews.

b. In 2023, the Company had 36 dock crews, of which three were released in early 2023 and nine were released later in the year. In 2024, the Company had 24 dock crews to begin the year and all were released in April.

c. The Company did not have any contractor dock crews in 2026 and does not plan on having any for the remainder of 2026 or at any point in 2027.

Date Filed: October 27, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Provide the annual average proportion of external lineworker crews and internal crews for overhead lines O&M work separately for the years 2021-2025.

Response:

Please refer to the external lineworker information below relating to overhead lines O&M.

Dock crew counts:
2021/2022 – Approximately 36 dock crews
2023 – 36 dock crews to start. 3 were released in early 2023 (2 April, 1 May) and 9 were released later in the year (November).
2024 – 24 dock crews to start. All released in April.
2025 – 0 dock crews.

3PA/Defective Poles/Frontier Shifts Crews:
2021 – 12 crews
2022 – 9 crews
2023 – 12 crews
2024 – 5 crews
2025 – Jan-Mar – 5 crews, Apr-Dec – 0 crews

Below is a table of internal lineworker counts from 2021-2025. These are individual counts, not crew counts.

CL&P Distribution
Line Workers
2021-2025

	2021	2022	2023	2024	2025
Average Line Mechanics	155	158	180	213	258
Average Line Helpers	117	127	120	135	120
Average Response Specialists	123	121	125	125	125
	395	406	425	473	503

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Exs. CLP-REVREQ-2, Schedule WP C-3.16 and CL&P REVEREQ-1, p. 90. Provide the following information for the "Other Field Operations" line item:

a. A description of the types costs included in the line item;
b. An explanation why the "out of period joint line billing adjustments" are appropriate; and
c. Documentation (e.g. invoices) supporting the inclusion of the $1,319,888 pro forma adjustment for "out of period joint line billing adjustments."

Response:

a. Please refer to RSR-053, Attachment 1, for descriptions of the costs included in Other Field Operations.

b. In 2025, Frontier Communications made payments on outstanding invoices dated from October 1, 2021, to September 30, 2024, in the total amount of $10,015,750, for joint line billing work performed by the Company. When billing is submitted, Eversource records the receivable and when payment is received the approved work orders paid are credited. Simultaneously, the billing from Frontier is debited to each of the approved work orders for work performed by them. These are adjustments for work performed for multiple years prior to 2025, and therefore, it is appropriate to remove them from the cost of service as an out of period adjustment.

c. The $1,319,888 pro forma adjustment represents the Field Operation Overhead Lines operation and maintenance portion of the overall $10,015,750 in payments from Frontier. The payments were recorded to the Company's general ledger in 2025. It is appropriate to make a pro forma adjustment to the 2025 Test Year because the payments are related to work performed over the period of Q1 2021 through Q3 2024. Please refer to RSR-053, Attachment 2, for the billing detail totaling the $10,015,750 payments from Frontier. Each incident is tracked through a sperate work order, these work orders are then allocated between multiple capital and operation and maintenance FERC accounts, the Company is providing the average work order allocation to Field Operation Overhead Line expenses.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Ex. CLP-REVREQ-2, Schedule WP C-3.16. Provide historical costs for each of the following categories for the years 2016-2025:

a. Outside Services;
b. Police and Flagging Services;
c. Meals, Mileage, and Employee expenses;
d. Permits, Fees, and Payments; and
e. Other Field Operations.

Response:

Please refer to RSR-054, Attachment 1. The Company is providing the historical costs for each of the following categories for the years 2021-2025, which is consistent with the historical C-3.16 Field Ops Overhead Lines totals provided in Exhibit CLP-REVREQ-3.

The Company provided Exhibit CLP-REVREQ-3 consistent with the schedules submitted for Yankee Gas Services Company pursuant to the Settlement Agreement in Docket No. 18-05-10, which provides, "Beginning with the Company's next rate case, the Company will file with its SFRs five years of historical expense data in the form of Schedule C-3.0," (See Motion 43, *Joint Motion to Approve Settlement Agreement*, Docket No. 18-05-10, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules, p. 12). The Historical C-3.0 is provided only for informational purposes. During the preparation of the Company's cost of service, the Company performs a detailed review of the Test Year data. This detailed review is not performed for historical years where that data does not impact the Company's Test Year nor its cost of service. As a result, the data and amounts given in Exhibit CLP-REVREQ-3 and RSR-054, Attachment 1, are not exact.

Please note that the expense classification shown in WP C-3.0, which is consistent with the rate case presentation format that has been in use for many years in Connecticut, is different than how operating expenses are reflected on the Company's books for management and financial reporting. To create the expense classification shown in WP C-3.0 at the time of a rate case, the Company utilizes a labor-intensive process that assigns actual Test Year operating costs to the categories shown in WP C-3.0. To categorize historical costs for an additional five years for the

period of 2016-2020 in the same manner would be an extremely laborious task that could not be achieved during the discovery period.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Ex. CLPREVREQ-2, Schedule WP C-3.17. Provide historical costs for each of the below categories separately for the years 2016-2025:

a. Outside Services;
b. Police and Flagging Services;
c. Meals, Mileage, and Employee expenses;
d. Permits, Fees, and Payments; and
e. Other Field Operations.

Response:

Please refer to RSR-055, Attachment 1, in which the Company is providing the historical costs for each of the following categories for the years 2021-2025, which is in accordance with the historical C-3.17 Field Ops Underground Lines totals provided in Exhibit CLP-REVREQ-3.

The Company provided Exhibit CLP-REVREQ-3 consistent with the schedules submitted for Yankee Gas Services Company pursuant to the Settlement Agreement in Docket No. 18-05-10, which provides, "Beginning with the Company's next rate case, the Company will file with its SFRs five years of historical expense data in the form of Schedule C-3.0," (See Motion 43, *Joint Motion to Approve Settlement Agreement*, Docket No. 18-05-10, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules, p. 12). The Historical C-3.0 is provided only for informational purposes. During the preparation of the Company's cost of service, the Company performs a detailed review of the Test Year data. This detailed review is not performed for historical years in which that data does not impact the Company's Test Year or its cost of service. As a result, the data and amounts given in Exhibit CLP-REVREQ-3 and RSR-055, Attachment 1, are not exact.

Please note that the expense classification shown in WP C-3.0, which is consistent with the rate case presentation format that has been in use for many years in Connecticut, is different than how operating expenses are reflected on the Company's books for management and financial reporting. To create the expense classification shown in WP C-3.0 at the time of a rate case, the Company utilizes a labor-intensive process that assigns actual Test Year operating costs to the categories shown in WP C-3.0. To categorize historical costs for an additional 5 years for the

period of 2016-2020 in the same manner would be an extremely laborious task that could not be achieved during the discovery period.

Date Filed: October 27, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Exs. CLP-REVREQ-2, Schedule WP C-3.17 and CLP-REVREQ-1, p. 91-92. Provide the following about the "Other Field Operations" category:

a. A description of the types of costs included in the line item;
b. An explanation why the "out of period joint line billing" Test Year "adjustments" are appropriate; and
c. Documentation (e.g. invoices) supporting the inclusion of the $176,000 pro forma adjustment for "out of period joint line billing adjustments."

Response:

a. Please refer to RSR-056, Attachment 1, for descriptions of the costs included in Other Field Operations.

b. In 2025, Frontier Communications made payments on outstanding invoices dated from October 1, 2021, to September 30, 2024, in the total amount of $10,015,750, for joint line billing work performed by the Company. When billing is submitted, Eversource records the receivable and when payment is received the approved work orders paid are credited. Simultaneously, the billing from Frontier is debited to each of the approved work orders for work performed by them. These are adjustments for work performed for multiple years prior to 2025, and therefore, it is appropriate to remove them from the cost of service.

c. The $176,000 pro forma adjustment represents the Field Operation Underground Lines operation and maintenance portion of the overall $10,015,750 in payments from Frontier. The payments were recorded to the Company's general ledger in 2025. It was appropriate to make a pro forma adjustment to the 2025 Test Year because the settlement is related to work performed over the period of Q1 2021 through Q3 2024. Please refer to RSR-056, Attachment 2, for the billing detail which totals the $10,015,750 payments from Frontier. Each incident is tracked through a sperate work order, these work orders are then allocated between multiple capital and operation and maintenance FERC accounts, the Company is providing the average work order allocation to Field Operation Overhead Line expenses.

Date Filed: October 26, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(POLE ATTACHMENTS) CLP-ADDITIONS-2, p. 67. Provide the following regarding third-party pole attachments:

a. The number of pole attachment applications received per year for 2017-2026 year to date; and
b. The number of poles associated with the applications received per year for 2017-2026 year-to-date.

Response:

a. Please refer to the table below for the number of attachment applications received per year 2017-2026 year to date.

b. Please refer to Table 1 for the number of poles associated with the applications received per year 2017-2026 year to date.

Table 1

Year	# of Applications	# of Poles
2026	851	17,133
2025	507	10,212
2024	1,088	53,801
2023	954	40,983
2022	1,068	57,994
2021	831	23,600
2020	614	17,627
2019	1,316	24,716
2018	1,054	22,835
2017	827	21,370