September 14, 2026

Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10, Application of the Connecticut Light and Power Company dba Eversource Energy to Amend its Rate Schedules - Response to Motion 43

Dear Commissioners:

Acadia Center and Conservation Law Foundation ("CLF") respectfully offer their support for the Office of Consumer Counsel's ("OCC") September 3, 2026 Motion for Clarification ("Motion 43") regarding the "scope of the current proceeding with respect to the performance-based ratemaking ("PBR") proposal submitted by the Connecticut Light and Power Company dba Eversource Energy ("Eversource", "the Company")." Motion 43 at 1.

As stakeholders in the multi-year PBR framework dockets, Acadia Center and CLF share OCC's concerns that, without Final Decisions in the reopeners associated with Docket No. 21-05-15, parties and intervenors in the immediate docket are acting without the benefit of final guidance from the Public Utilities Regulatory Authority ("PURA") on critical matters that substantially impact the Company's rate proposal. Eversource's proposed PBR framework varies significantly from the Draft PBR Decisions and deviates from best practices explored in those dockets. Many years of effort went into the PBR framework dockets, which involved extensive stakeholder involvement; to replicate that scrutiny here without final guidance from PURA, on the timeline of a rate case, would be a significantly difficult exercise for parties and intervenors. Clarification from PURA with respect to evaluating the company's PBR proposal, specifically the multi-year rate plan with revenue cap formula and total factor productivity study, in the context of the PBR framework dockets, could ameliorate that difficulty.

To briefly address a point made in Eversource's Response to Motion 43: regardless of whether the PBR framework dockets are preclusive, Final Decisions in those dockets would provide actionable guidance to parties and intervenors in this proceeding. Such guidance would promote administrative efficiency and conserve parties' and intervenors' limited resources and ability to respond meaningfully to the Company's proposal.

As such, Acadia Center and CLF support OCC's Motion for Clarification. Acadia Center and CLF appreciate PURA's consideration of Motion 43 and this supportive response.

Respectfully submitted,

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Cc: Service List