August 28, 2026

VIA ELECTRONIC MAIL

RE: Docket No. 26-05-10 – Application of the Connecticut Light and Power Company d/b/a Eversource Energy To Amend Its Rate Schedules

Dear Counsel:

Enclosed please find the second set of information requests from Conservation Law Foundation and Sierra Club in the above-referenced matter, issued to Connecticut Light and Power Company d/b/a Eversource Energy. If there are any objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

Sincerely,

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Enclosures
cc: Service List

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct, and complete copies of the original document.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody, or control of the responding party's directors, officers, employees, representatives, or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

F. Where an Interrogatory asks to provide all documents please provide all data, assumptions, schedules, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of live unlocked Microsoft Excel spreadsheet files with all cell references/links and formulae intact.

G. Each Interrogatory to provide all documents or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the

document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

H. If the Company finds any request to be ambiguous, please notify Conservation Law Foundation and Sierra Club through their counsel so that the request can be clarified prior to the preparation of a written response.

I. If information requested is not available and cannot be made available in the exact form requested, provide such information or documents as can be made available that best respond to the request.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production requests you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody, or control, or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

DEFINITIONS

1. The "Company" or "Eversource" refers to the Connecticut Light and Power Company d/b/a Eversource Energy. Unless the request specifically provides otherwise, the term Company or Eversource includes all witnesses, representatives, employees, and legal counsel.

2. "Document," "documentation," or "workpaper" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or

reports, bills, checks, articles from journals or other sources, other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

INTERROGATORIES

CLF-SC-21. If the Company cannot provide the item requested in CLF-SC-20, please explain the methodology the Company would use if required to isolate the heat-pump-specific contribution to winter and summer peak forecasts, if required to do so.

CLF-SC-22. Please provide the Company's current internal technical documentation, however titled, that describes in detail the methodology the Company uses to develop the feeder-, substation transformer-, and (if applicable) substation-level load forecasts described in the responses to CLF-SC-12 through CLF-SC-19, including, at a minimum:

a. the forecasting model or approach used (e.g., econometric/regression modeling, etc.), and how historical loads, weather data, economic or demographic inputs, and other data are incorporated;

b. how forecasted adoption of demand-side factors such as energy efficiency, distributed solar, electric vehicles, demand response, distributed energy storage, and heat pump adoption/electrification (individually or in combination) is developed and then spatially allocated down to the feeder or substation transformer level; and

c. the specific weather condition(s) or percentile(s) (e.g., a 50/50 normal or a 90/10 or 95/5 extreme weather scenario) assumed for feeder- and substation-transformer-level planning purposes.

If the Company does not maintain a single document of this kind, please provide all documents that collectively provide this information. If the Company contends that any portion of the requested document(s) is confidential or proprietary, please produce it subject to an appropriate protective order rather than withholding it, and identify the specific basis for confidentiality as to each such portion.

CLF-SC-23. Please provide the Company's current internal technical documentation, however titled (such documentation is commonly maintained by distribution utilities under titles such as "Distribution Planning Criteria" or "Distribution Planning Guidelines," though titles vary), that establishes the distribution planning criteria used by the Company's distribution planning engineers including:

a. the specific voltage, thermal, current-imbalance, and power-factor planning criteria and numerical thresholds (e.g., normal, long-time emergency, and, if applicable, short-time emergency ratings) applicable to the Company's feeders, substation transformers, and substations;

b. the specific process, including any monitoring, review, or approval steps, by which a feeder, substation transformer, or substation is flagged as having a thermal, voltage, current-imbalance, or N-1 contingency violation or constraint;

c. the specific process and criteria by which the Company develops, prioritizes, and selects remediation solutions (including non-wires alternatives) once a constraint is identified, including any risk-scoring methodology, cost thresholds, look-ahead periods, or sequencing rules.

If the Company does not maintain a single document of this kind, please provide all internal engineering standards, planning manuals, procedures, or guidelines that collectively provide this information. If the Company contends that any portion of the requested document(s) is confidential or proprietary, please produce it subject to an appropriate protective order rather than withholding it, and identify the specific basis for confidentiality as to each such portion.

CERTIFICATE OF SERVICE

This is to certify that on this 28th day of August, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list the applicable proceedings in accordance with R.C.S.A. Section 16-1-15.

/s/ Sarah Krame

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