Date Filed: November 03, 2026

Witness: Counsel
Request from: ALLCO

Question:
(Queue position on the Somers/Bilton circuits.) With respect to the distribution circuit(s) and substation serving the Bilton Solar (LREC9-3045), Point Solar (LREC9-3058), and Bilton cluster (LEG-22750, LEG-22751, LEG-22752) projects in Somers, state, in native format, for every interconnection application of 50 kW or more received by the Company for a facility on the same circuit(s) or substation from January 1, 2015 to the present:

(a) the PowerClerk or legacy application identifier, applicant (which may be anonymized other than for the Connecticut Green Bank, its affiliates, and projects financed or owned through Green Bank programs, and other than Allco and its affiliates), nameplate capacity, and date-stamp assigned under Guidelines § 2.6; (b) the dates of each study, Contingent Approval, interconnection-agreement issuance, execution by the Company, construction start, and Permission to Operate; (c) the hosting capacity of the circuit and substation as of each such date, and the upgrade cost assigned to each application; (d) each instance in which an application with a later date-stamp than an Allco-affiliate application received a study result, an interconnection agreement, or Permission to Operate before the Allco-affiliate application, and the reason; (e) whether any Green Bank-affiliated or Green Bank-financed project on those circuits was processed under a program, agreement, or priority not available to other applicants, identifying it; and (f) the person(s) who made each sequencing decision.

Response:

Eversource objects to this request. Allco's overly broad, unduly burdensome, and repetitive request concerning third-party interconnection applications and specific circuit information 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 overly broad, unduly burdensome, and repetitive request concerning third-party interconnection applications and specific circuit information is not relevant 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 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Institutional and pension-fund ownership of Eversource Energy.) The Company has represented to the United States District Court (No. 3:26-cv-01277, ECF 46-3) that the State Board of Administration of Florida Retirement System holds 312,059 Eversource Energy shares, drawn from that fund's Form 13F-HR. State: (a) for each of the fifty largest holders of Eversource Energy common shares as of the most recent date for which the Company or Eversource Energy has data, the holder, the number of shares, and whether the holder is a public or private pension fund, an index fund, an actively managed fund, an insurance company, or other; (b) the aggregate percentage of Eversource Energy's shares held by public pension funds, and the source; (c) the actuarial assumed rate of return of each public pension fund among those holders of which the Company or its ROE witness is aware, and the assumed long-term equity return used in Eversource Energy's own pension plans; (d) whether the Company or its ROE witness considered that the return investors require of Eversource Energy is evidenced by the return assumptions of the pension funds that hold it, and if not, why not; and (e) each service (e.g., Broadridge, DTC, NOBO lists, 13F compilations) through which Eversource Energy identifies its beneficial holders, and the date of the most recent such list.

Response:

Eversource objects to this request. Allco's request concerning the lawsuit that it filed against the Company 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. Moreover, Allco's request is an improper effort to use this rate case proceeding to obtain discovery for purposes of that lawsuit.

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. Simiarly, "[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 concerning the lawsuit that it filed against the Company is not relevant 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 03, 2026

Witness: Warren R. Boutin, Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

(Overheads recovered in base rates ─ Docket No. 17-10-46.) State: (a) the amount of administrative and general expense, engineering and supervision, construction overhead, and other indirect cost included in the distribution revenue requirement approved in Docket No. 17-10-46, by FERC account, and the amount of each proposed in this docket; (b) the capitalized overhead and clearing-account rates (including the engineering, supervision, administrative, and construction-overhead loaders identified in ALLCO-102, Attachment 1) in effect in each year 2018 through 2026, and the dollar amount of overhead capitalized to distribution plant in each year; (c) for each year 2018 through 2025, the dollar amount of overhead charged to interconnection customers and other customer-funded work orders through those loaders, and whether that amount was credited against the overhead pool recovered through base rates, capitalized plant, or both ─ identifying the account and the credit; (d) whether any portion of the overhead charged to interconnection customers consists of costs that are also recovered from all customers through base rates set in 17-10-46 or proposed here, and if the Company contends there is no such double recovery, the reconciliation that shows it; and (e) the percentage overhead rate applied to customer-funded interconnection work in 2018, when 17-10-46 rates took effect, and each change since, with the approval for each change.

Response:

CL&P objects to this request on the ground that it is 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. 3:36-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.

Without waiving said objections, please refer to the Company's response to ALLCO-044[i], which is responsive to the question.

Prior Referenced Response:

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[i] ALLCO-044 Question:

With respect to each cost category included in the percentage overhead or "CIAC" rates applied to interconnection upgrade, study, and construction costs charged to distributed generation, qualifying facility, and other interconnection customers (including, without limitation, project management, engineering and supervision, administrative and general expense, employee benefits or compensation loaders, insurance, and Eversource Energy Service Company charges): (a) identify each such cost category and its share of the overhead rate in effect in each year 2018 through 2025; (b) state whether the costs in each such category were included, in whole or in part, in the test-year cost of service and revenue requirement approved in the Company's most recent prior general distribution rate proceeding, Docket No. 17-10-46, and therefore recovered from all ratepayers through base distribution rates during 2018 through the present; (c) if the answer to any part of subpart (b) is affirmative, explain why applying overhead rates that include the same cost categories to amounts charged to interconnection customers does not result in the Company recovering the same costs twice — once from ratepayers generally and again from interconnection customers; (d) quantify, for each year 2018 through 2025, the total dollar amount of overheads collected from interconnection customers in cost categories that were also reflected in base rates; and (e) state whether amounts collected from interconnection customers through overhead rates are recorded as a credit or offset to the corresponding expense or plant accounts recovered in base rates and, if not, where those amounts are recorded, consistent with the Company's description of its netting treatment of third-party attacher billings in its response to RRU-002.

ALLCO-044 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, please note that capital expenditures (direct costs and overheads applied to those amounts) are entirely billed to the interconnection customer and reimbursed through the CIAC process; therefore, these asset additions are not included in rate base. Please refer to ALLCO-064 for additional discussion on the CIAC rate and ALLCO-003ii where the Company goes into more detail on the CIAC Tax Adder.

Date Filed: November 05, 2026

Witness: Warren R. Boutin, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

(Exhibit CLP-Additions-4 Supplemental 2 ― distributed-generation interconnection projects.) Exhibit CLP-Additions-4 Supplemental 2 (filed October 19, 2026) reports, for projects categorized as "New Customer" distributed-generation interconnections, negative life-to-date direct costs but positive total costs and in-service additions ― for example CD01237 (Bristol Solar One Interconnection: direct −$104,968; total $209,423), CD00450 (Lisbon/Preston 20 MW Solar: −$421,868; $443,186), CD00794 (Pawcatuck Solar Center: −$81,796; $530,316), CD01242 (SR− Litchfield Interconnection: −$879,493; $352,781), CD01244 (SR N Stonington Interconnection: −$751,160; −$132,892), and CD01594 (Haddam Qtr Solar: −$191,799; −$6,523). For each project in that exhibit whose description or project type indicates a generator interconnection, state in native format: (a) the gross direct cost, the customer contribution credited, each overhead or indirect loader applied (by name, rate, and dollar amount), and the resulting total cost; (b) the amount placed in rate base and the amount of the customer contribution recorded as CIAC, by account; (c) whether the overhead charged to the interconnection customer on the same work order was credited against the overhead capitalized, and if not, why not; and (d) the final accounting status of the project under Guidelines § 1.2 and the amount of any refund due or paid.

Response:

a. thru c. Please refer to RSR-058, Attachment 1, which identifies each project associated with distributed generation (DG), including the corresponding line references in Exhibit CLP-ADDITIONS-4 and the Exhibit CLP-ADDITIONS-4 Supplemental filings. The Company notes that information regarding new plant additions on a monthly basis for 2026 is provided as part of the Company's supplemental filings. Furthermore, note that each referenced project also contains a closing report which summarizes the actual charges for each project.

(d) The Company is currently gathering the data and will supplement this response once the data is available.

Date Filed: November 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ALLCO-152 — loss factors.) The response states that for ISO-NE load settlement the Company "does not apply a static value to convert metered retail sales to wholesale loads." State: (a) the method the Company does apply, step by step, including each loss factor, allocation, or estimation used, and its source; (b) the most recent distribution loss study the Company or Eversource Energy Service Company has prepared or commissioned for the Connecticut system, by title, date, and author, and produce it; (c) the annual 2025 totals of the hourly wholesale loads in ALLCO-063, Attachment 1, for Standard Service, Last Resort Service, and competitive supply, and the annual 2025 retail kWh billed in CIEC-020, Attachment 2 — stated as numbers, not by cross-reference — and the difference; and (d) the Company's best estimate of the components of that difference (technical losses, unaccounted-for energy, company use, unbilled usage, and other), with the basis for each.

Response:

Eversource objects to this request. Allco's request concerning load settlement 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. Simiarly, "[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 concerning load settlement is not relevant 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 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ALLCO-149 — outside legal expense by matter.) The response states that "[f]or all outside counsel legal matters there is a legal matter number" maintained in the Thomson Reuters Legal Tracker e-billing system. Using that system, state in native format for the Test Year and for 2023, 2024, and 2026 year to date: (a) for each outside-counsel matter with billings exceeding $10,000, the matter number, the vendor, the amount billed, the amount charged or allocated to the Company, the FERC account, the category of matter (litigation, regulatory, transactional, employment, collections, other), and, for litigation, the forum and the adverse party's relationship to the Company (customer, developer or interconnection customer, contractor, employee, regulator, other); (b) the amounts in (a) billed by Day Pitney LLP, Cowdery Murphy & Healy LLC, Keegan Werlin LLP, and Steptoe & Johnson LLP for matters involving Allco or its affiliates, Windham Solar LLC, any distributed-generation interconnection dispute, FERC Docket No. EL25-117-000, Civil Action No. 3:26-cv-01277, PURA Docket No. 25-03-12, or the SCEF program, by matter; (c) whether any amount in (b) is included in the Test Year cost of service, the Rate Year revenue requirement (including through the escalation applied in Schedule C-3.20), or Exhibit CLP-REVREQ-9, and where; and (d) if the Company contends that the Legal Tracker system cannot produce the report described in (a), the person who made that determination and the steps taken to test it.

Response:

The Company objects to this request as this question has been asked and answered. The Company has provided responses in ALLCO-033[i] and ALLCO-149[ii], and therefore ALLCO's request is cumulative and does not advance the development of the evidentiary record. Conn. Gen. Stat. § 4-178(1) (administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence). Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Prior Refenced Responses:

[i] ALLCO-033 Question:

With respect to the outside legal expense itemized by vendor in the Company's response to OCC309, Attachment 1: for each vendor listed, provide a breakdown of the Test Year (2025) expense by matter, stating for each matter: (a) a description of the matter sufficient to identify its nature — for litigation, the court and caption (or, if privilege is

asserted as to a caption, the category of dispute and the adverse party's relationship to the Company, e.g., customer, developer, contractor, employee, regulator); for regulatory matters, the agency and docket number; and for transactional, collections, employment, or other matters, the category; (b) the amount billed to or allocated to the Company for that matter in the Test Year; (c) whether the Company (or an affiliate) is the plaintiff/claimant or the defendant/respondent in the matter; (d) whether the matter has been concluded or remains pending; and (e) the FERC account charged and whether the amount is included in the proposed Rate Year revenue requirement (including through the GDP-PI escalation applied in Schedule C-3.20). This interrogatory seeks matter-level detail for the Test Year amounts only and does not repeat OCC-309 or Q-ALLCO-019.

ALLCO-033 Response:

CL&P does not track or maintain information on outside legal expense in a format that is commercially reasonable for the Company to collect and provide during the time period designated by Allco for the submission of this interrogatory response.

Subject to and without waiving the foregoing, please refer to ALLCO-033, Attachment 1, for a listing of CL&P's legal service costs incurred in the Test Year (2025) and any adjustments for the Rate Year. In the course of responding to this interrogatory the Company identified storm attestation work initially recorded to the legal cost element and should have been removed in the preparation of the initial cost of service and therefore has been adjusted out of this attachment. The Company plans to incorporate this update in its next applicable cost of service update. To prepare this listing , the Company identified the category of legal services provided and identified the direct or allocated charges. Legal costs are either directly charged to CL&P when the Company is the only beneficiary of the services, or allocated when multiple business segments benefit from the activity. The Company confirms that the totals on line 145 of OCC-309, Attachment 1, are the amounts charged to CL&P. Please also refer to OCC-308, Attachment 1 CONFIDENTIAL, for a list of litigation, status of the matter and the dates these legal matters were resolved.

[ii] ALLCO-149 Question:

Produce, in native (Excel) format with all formulas intact, each discounted cash flow, capital asset pricing model, risk premium, expected earnings, or other analysis underlying the Company's return-on-equity recommendation, and for each: (a) identify each growth rate used, its source, and its period; (b) state whether any growth rate used exceeds projected long-run nominal growth of the United States economy and, if so, explain why such a growth rate is sustainable in perpetuity for a regulated distribution utility; (c) identify the source and vintage of the market risk premium and of each interest rate or bond yield used, stating whether each yield is an actual (spot or trailing) yield or a projected yield; and (d) provide the results of each model rerun using actual rather than projected yields, if projected yields were used.

ALLCO-149 Response:

Please refer to the Company's response to OCC-365i for Ms. Bulkley's workpapers.

(a) Please refer to OCC-365.

(b) Ms. Bulkley has not conducted the requested analysis.

(c) Please refer to OCC-365.

(d) Please refer to OCC-365 for the analyses relied upon by Ms. Bulkley. Ms. Bulkley has not prepared any additional calculations that were not provided in these workpapers.

Date Filed: November 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ALLCO-151 — corrected billing-determinant data.) Produce ALLCO-062, Attachment 1 corrected for the January 2025 Rate 35 input error acknowledged in ALLCO-151(a), and for each other monthly figure in that attachment that is negative or that departs from the rate class's other months by a factor of two or more, state whether the figure reflects a billing correction, a cancel-and-rebill, a customer migration between standard service and competitive supply, or an input error, and provide the corrected figure where applicable; state whether any figure in the attachment was used, directly or through the annual totals in OCC-365, Attachment 1, in deriving the Test Year or Rate Year billing determinants; and identify the person who verified the corrected attachment.

Response:

The Company provided the corrected January 2025 Rate 35 number in response to ALLCO-151[i].

Eversource objects to the remainder of the request. Allco's unduly burdensome and repetitive request concerning billing determinants 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. Simiarly, "[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 additional request concerning billing determinants is not relevant 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.

Prior Referenced Response:

[i] ALLCO-151 Question:

(Follow-up to ALLCO-062 — data anomalies.) In ALLCO-062, Attachment 1: (a) explain the January 2025 Rate 35 figure of 124,140,351 kWh, which exceeds every other month for that rate by a factor of approximately twenty; (b) explain the October 2025 Rate 37 figure of 87,505,530 kWh, which exceeds every other month for that rate by a factor of approximately five; (c) explain the negative January 2025 Rate 29 figure of (1,371,750) kWh and the negative and sporadic Rate 39 and Rate 119 figures; (d) state whether each such figure reflects a billing correction, a cancel-and-rebill, or an error, and provide a corrected attachment; and (e) state whether the billing determinants used in the Company's cost-of-service and rate-design exhibits incorporate these figures as shown.

ALLCO-151 Response:

(a) The January 2025 Rate 35 figure of 124,140,351 kWh was input incorrectly. The correct January 2025 Rate 35 figure is 6,446,771 kWh.

(b) (c), (d) The above-referenced fluctuations in customer energy supply usage patterns, which reflect customers switching back and forth between electing to take energy supply service from competitive retail suppliers versus taking standard or last resort electric service from an electric distribution company as well as general usage trends, are not attributable to a single causal factor and instead are impacted by a variety of different factors that influence customers' decisions to leave and then rejoin standard service or last resort electric service or increase/decrease usage. Nor is the Company able to speculate what the primary reasons are that caused customers, at certain points in time, to leave and then rejoin standard service or last resort electric service or increase/decrease usage.

(e) The Company uses total company annual sales to determine its Rate Year billing determinants and does not rely on monthly, standard service, or last resort service sales data in its analysis. Please refer to OCC-365, Attachment 1, for the workpapers behind the Test Year and Rate Year sales determinants used by the Company in this proceeding.

Date Filed: November 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Accounting treatment of developer funds held by the Company.) For each of the following sums, state, by general-ledger account number and title, how the Company recorded the receipt, and each subsequent reclassification, of the funds; the date of each entry; whether the funds were at any time recorded as a liability to the developer, as forfeited security, as a credit to ratepayers or to the LREC/ZREC, SCEF, or interconnection cost-recovery mechanisms, or as revenue; the FERC account and rate-case schedule, if any, in which the balance appears; and the person who authorized each entry: (a) the $257,260.19 of interconnection-cost refunds computed in the Final Accounting Reports issued in December 2024 for the Allco-affiliate projects and confirmed in the Company's January 16, 2025 correspondence; (b) the $225,000 of SCEF Year 6 bid deposits posted by Allco affiliates in 2025; (c) the $734,339.76 of Performance Assurance posted under the LREC/ZREC contracts terminated in 2024; and (d) the $559,907.00 of Development Period Security posted under the power purchase agreements that terminated on or about July 23, 2024. Produce the ledger detail and journal entries in native format.

Response:

Eversource objects to this request. Allco's overly broad, unduly burdensome, and repetitive request concerning deposits and interconnection-cost refunds 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. Simiarly, "[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 overly broad, unduly burdensome, and repetitive request concerning deposits and interconnection-cost refunds is not relevant 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 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(The "letterhead" condition on the return of SCEF deposits.) The Company conditioned the return of the SCEF Year 6 bid deposits described in Q-ALLCO-230(b) on receipt of a request on the bidder's letterhead. Identify the provision of the SCEF Program Manual, Terms and Conditions, or any tariff, order, or Company policy that imposes that condition; the person who decided to impose it and the date; every other bidder in SCEF Years 1 through 7 whose deposit refund was conditioned on a letterhead request, and the elapsed time between non-selection and refund for each; and whether any bidder other than an Allco affiliate waited more than ninety days after non-selection for the return of a deposit, identifying each.

Response:

Eversource objects to this request. Allco's request concerning SCEF deposits 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).

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Here, Allco's request concerning SCEF deposits is not relevant 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).

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Date Filed: November 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Internal communications concerning the force majeure notices.) With respect to the notices of force majeure delivered on behalf of Ecos Energy LLC and PLH Vineyard Sky LLC under Article 15 of the LREC/ZREC contracts and Article 10 of the power purchase agreements (filed in No. 3:26-cv-01277 as ECF 47-42 and 47-44), identify every person who received or reviewed the notices; every written response, if any, and the date; every internal communication, memorandum, or legal-department entry concerning whether to accept, dispute, or respond to the notices and whether the Performance Assurance and Development Period Security would be retained or returned; the date on which the Company first recorded or treated those sums as forfeited; and the person who made that decision. Produce the documents, with a privilege log for any withheld.

Response:

Eversource objects to this request. Allco's request concerning force majeure notices 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[.]").

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Here, Allco's request concerning force majeure notices is not relevant 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).

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Date Filed: November 03, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Treatment of forfeited developer security in rates.) State the total amount of developer security, bid deposits, and interconnection-cost overpayments retained or treated as forfeited by the Company in each year 2019 through the Rate Year; the mechanism (LREC/ZREC reconciliation, SCEF reconciliation, FMCC, base rates, or other) through which each amount was credited to or otherwise reflected in rates, with the docket and schedule; whether any such amount is reflected in the revenue requirement, rate base, or reconciliation balances proposed in this Docket; and whether the Company has ever returned security or deposits after first treating them as forfeited, identifying each instance.

Response:

Eversource objects to this request. ALLCO's overly broad, unduly burdensome, and repetitive request concerning deposits 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[.]").

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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. Simiarly, "[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 overly broad, unduly burdensome, and repetitive request concerning deposits is not relevant 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.