STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

October 6, 2026
In reply, please refer to:
Docket No. 26-05-10

Vincent Pace, Esq.
Assistant General Counsel
Eversource Energy Service Company
P.O. Box 270
Hartford, CT 06141

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 Attorney Pace:

Enclosed are interrogatories numbered **UPA-65 through UPA-80** directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Company) and refer to the Company's request to amend its rate schedules.

The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) in connection with the above-referenced docket and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **October 20, 2026, at 4:00 p.m.** The Authority encourages the submission of responses as soon as they are available rather than delaying until all answers are completed. **Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.**

Similarly, each Late Filed Exhibit that may be submitted after hearing in this docket shall be sequentially numbered and identified with the Docket Number, Late Filed Exhibit Number, page number, the name of the company and the person responsible for the exhibit, and the date of submission.

If a response to any of the requested information has already been filed in response to another Parties' interrogatory(ies) in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

ELECTRONIC SUBMISSION OF FILINGS

IMPORTANT NOTE: The Authority has indefinitely suspended the paper copy filing requirement. Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to the Electronic Filing webpage for more information, including on confidential materials: Make An Electronic Filing

CONFIDENTIAL DOCUMENTS

No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by emailing the material to Jeff.Gaudiosi@ct.gov with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed electronically.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. §1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion must be appended to the Motion. The Authority will rule on the Motion forthwith, and it will give further direction as necessary.

The current service list for this docket is available on the Authority's website located at http://www.dpuc.state.ct.us/DPUCPublicList.NSF.

By the Direction of the Authority,

PUBLIC UTILITIES REGULATORY AUTHORITY



Jeffrey R. Gaudiosi, Esq.
Executive Secretary

Enclosure
cc: Service List

DOCKET NO. 26-05-10
APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES

Interrogatories UPA-065 through UPA-080 are directed to The Connecticut Light and Power Company (CL&P or Company) and refer to the Company's request to amend its rate schedules (Application).

UPA-065 (OM&A Partial Factor Productivity (PFP)) Exhibit CLP-PBR-1; Interrog. Resp. OCC-442. Identify any material differences, not identified in the response to Interrogatory OCC-442, between National Grid and FortisBC Inc. and the Company's proposed Performance-based multiyear rate plan (PBMRP) regarding which costs are subject to the revenue cap and how costs excluded from the cap, including capital costs, are treated and recovered.

UPA-066 (X-FACTOR) Exhibit CLP-PBR-1; Exhibit CLP-PBR-2. Identify which utilities included in London Economics International's (LEI) industry total factor productivity study (Industry TFP Study) operate in restructured or deregulated electricity markets and which operate as vertically integrated utilities. Identify any analysis performed by LEI to evaluate whether differences in market or regulatory structure affect the comparability of the utilities included in the Industry TFP Study or the resulting operations, maintenance, and operating expenses(OM&A) PFP estimate.

UPA-067 (CONSUMER DIVIDEND) Exhibit CLP-PBR-1; Exhibit CLP-PBR-3. Identify which of the 88 utilities included in LEI's econometric benchmarking sample operate in restructured or deregulated electricity markets and which operate as vertically integrated utilities. Explain and provide any analysis performed by LEI to test or control for differences in market or regulatory structure in the unit and econometric benchmarking analysis.

UPA-068 (CONSUMER DIVIDEND) Exhibit CLP-PBR-3; Interrog. Resp. OCC-559(b). The Company states that Figure 16 is an "illustrative sample" and "was not intended to include every North American PBR plan reviewed by LEI." Provide a list of all North American PBR plans reviewed by LEI in connection with developing, evaluating, or supporting the proposed 0.30% Consumer Dividend, including plans not presented in Figure 16. For each plan, identify the jurisdiction, utility, applicable Consumer Dividend/stretch factor, and whether the plan was considered by LEI in selecting or evaluating the proposed 0.30% Consumer Dividend.

UPA-069 (CONSUMER DIVIDEND) Exhibit CLP-ELP-1, pp. 94; Interrog. Resps OCC-539. The Consumer Dividend increases by 0.10 percentage points when the Company's Core Operating Expense per customer is below the applicable inflation-adjusted benchmark and decreases by 0.05 percentage points when it is not. Identify all quantitative analyses, calculations, empirical evidence, or regulatory precedents relied upon to establish the 0.10 and 0.05 percentage-point adjustments. Provide the results in an unlocked Excel workbook with all equations, calculations, links, and underlying assumptions/workpapers unhidden, unprotected, and in a reproducible format.

UPA-070 (I-FACTOR) Interrog. Resp. OCC-428; Interrog. Resp. OCC-537. The proposed I-Factor is constructed over a 20-year historical industry OM&A labor/non-labor split of approximately 33%/67%. Identify any analysis performed to determine whether these industry labor/non-labor cost shares are representative of the labor/non-labor composition of the Company's Core Operating Expenses. Provide the results in an unlocked Excel workbook with all equations, calculations, links, and underlying assumptions/workpapers unhidden, unprotected, and in a reproducible format.

UPA-071 (I-FACTOR/CONSUMER DIVIDEND FACTOR INTERACTION) Exhibit CLP-ELP-1, pp. 94–95. The Core Operating Expense per-customer benchmark is adjusted annually by the equation I−X factor and that performance relative to this benchmark determines subsequent adjustments to the Consumer Dividend. Identify any quantitative analysis performed by LEI or the Company evaluating how changes in the I-Factor affect the Core Operating Expense benchmark and resulting Consumer Dividend adjustments. Provide the results in an unlocked Excel workbook with all equations, calculations, links, and underlying assumptions/workpapers unhidden, unprotected, and in a reproducible format.

UPA-072 (CONSUMER DIVIDEND) Exhibit CLP-ELP-1. The Consumer Dividend is capped so that it does not exceed the applicable I-Factor for the year. Explain how the cap operates when the Consumer Dividend resulting from the ratchet exceeds the I-Factor (e.g., is it temporarily blocked, does it disappear, etc.). Provide an illustrative calculation and identify the Consumer Dividend used as the starting point for the following year's ratchet. Provide the results in an unlocked Excel workbook with all equations, calculations, links, and underlying assumptions/workpapers unhidden, unprotected, and in a reproducible format.

UPA-073 (REVENUE CAP FORMULA) Exhibit CLP-ELP-1, p. 95. "Core Operating Expense" includes "O&M costs recovered through the existing capital recovery mechanism." Identify the O&M costs referenced by this statement, including the applicable FERC accounts or subaccounts, and identify the capital recovery mechanism through which each such expense is recovered. Explain how these O&M costs are treated in calculating the O&M Revenue Requirement subject to the I-X-Consumer Dividend Formula.

UPA-074 (TFP Study) Exhibit CLP-PBR-2; Interrog. Resp. OCC-560. London Economics International (LEI) states that it did not evaluate the possibility of a structural break in the total factor productivity (TFP) series associated with the COVID-19 pandemic and its economic disruptions. Explain the basis for assuming that TFP followed a stable multiplicative growth process throughout 2005-2024, despite the large, non-cyclical shock observed during the pandemic years.

UPA-075 (TFP Study) Exhibit CLP-PBR-2; Interrog. Resp. OCC-560. LEI states that an industry TFP study "reports historical trends." Since the proposed performance-based rate (PBR) term spans 4 years, projecting a forward-looking productivity factor requires identifying an appropriate trend rather than selecting a single historical average. Explain why a single historical value is considered appropriate for projection, especially given periods of atypical conditions (such as the COVID-19 pandemic) in the selected timeframe.

UPA-076 (OM&A PFP and X-FACTOR) Exhibit CLP-PBR-2, p. 22. The text states that "there are several well-known number indexation techniques and resulting index formulations: Laspeyres index, Paasche index, Fisher Ideal index, and Törnqvist index, as shown in Figure 7." However, the figure does not provide the Törnqvist index equation. Provide the Törnqvist index formula, and any other missing terms, that corresponds to the indexation techniques discussed in Figure 7.

UPA-077 (X-FACTOR) Exhibit CLP-PBR-2. 1988 was used as the benchmark year for initializing the capital stock. Although operations, maintenance, and administration (OM&A) is analyzed separate from capital, capital inputs still enters the TFP calculation underlying the X-factor. Explain whether the Company or LEI evaluated any alternative benchmark years (such as 1995, 2000, or 2005). Explain whether selecting a different benchmark year would change the capital input path in a way that would alter the TFP growth and X-factor derived for this study (e.g., the share weights between capital and OM&A).

UPA-078 (OM&A PFP and X-FACTOR) Exhibit CLP-PBR-2, p. 34–36. LEI states that it assumes a 35-year average service life for electric distribution assets. Explain in detail how LEI determined that 35 years is the appropriate estimate for average service life, including all data sources, calculations, and assumptions used. Provide these data sources, calculations, and assumptions in an unlocked Excel workbook, with formulas and links unhidden and unprotected. Explain how a different service-life assumption would affect the analysis. Include both the direction and magnitude impact on the results.

UPA-079 (OM&A PFP and X-FACTOR) Exhibit CLP-PBR-2, p. 36. Confirm in equation K_t whether 1989 represents the starting vintage year "s" and 2024 represents the ending year "t," or vice-versa.

UPA-080 (WACC and X-FACTOR) Exhibit CLP-PBR-2, p. 38. LEI states that it used an average weighted-average cost of capital (WACC) of 6.05% in the implicit rental price formula for estimating the capital input price. Explain how LEI determined that 6.05% was the appropriate forward-looking WACC assumption, including all data sources and methodological steps. Explain how using a different WACC would change the implicit rental price formula and the resulting capital share used in the TFP analysis, including how these changes would affect the OM&A productivity (PFP) results. Include both the direction and magnitude of the changes.