Date Filed: September 28, 2026

**Witness: Jared A. Lawrence**
**Request from: Office of Consumer Counsel**

**Question:**
Refer to Exhibit CLP-AMI-2 at 49, "Green Button Connect".

a. Please provide the data requirements that will be shared with authorized third parties including the following:
   i. Data Types (e.g raw meter usage, billing quality meter usage, customer account information, customer bill etc.)
   ii. Data fields for each data type
   iii. Interval, update frequency and number of historical years of data for each data type
b. Please provide details on the following functional requirements that will inform the implementation of green button connect including the following:
   i. Registration and onboarding process
   ii. Authorization and authentication
      1. Regarding authorization and authentication, please indicate whether the Company intends to allow third parties to allow the bulk authorization and authentication of customers
   iii. Any Terms & Conditions that will be required for third parties to use the platform
c. Please describe what the Company means by "bulk data sharing", how this will be implemented and whether this will be separate or incorporated into the green button connect implementation.
d. Please describe any metrics the Company intends to report on for the performance of green button connect.
e. Does the Company intend to design the platform to be extensible to other types of energy data? If so, please describe how this will be implemented.
f. Please describe whether the Company intends to conduct stakeholder engagement to inform the Green Button Connect implementation. If so, please describe how this will be implemented.

**Response:**

(a) The data requirements that will be shared with authorized third parties include the following:

1. The Company anticipates making the following categories of data available to authorized third parties through its Green Button Connect ("GBC") and associated data sharing platforms:

- Customer account and service information.
- Billing-quality usage data, including validated consumption and demand information.
- Interval usage data from Advanced Metering Infrastructure ("AMI") meters.
- Supplier and service relationship information.

The Company does not currently anticipate providing bill image PDFs through the platform. However, the underlying billing and usage data elements associated with customer bills may be made available.

2. The data fields anticipated to be available include, but are not limited to, the following:

- <u>Customer Account and Service Information</u>
  - Account number
  - Customer name
  - Customer email address
  - Customer phone number
  - Service address
  - Mailing address
  - Rate class/rate code
  - Meter number
  - Supplier identifier
  - Supplier name
  - Supplier type
  - Supplier effective date

- <u>Billing and Usage Information</u>
  - Billing period
  - Current and previous meter readings
  - Consumption for current period
  - Consumption for prior period
  - Commodity type
  - Bill amount
  - Customer charge
  - Delivery charge
  - System benefit charge
  - Applicable taxes and surcharges
  - Peak demand
  - Quality of reading indicators

- Interval Usage Information
  - Interval reading date and timestamp
  - Interval consumption value
  - Interval duration
  - Interval quality indicator
  - Time-of-use designation, where applicable

3. The Company anticipates providing validated, estimated, and edited ("VEE") billing-quality AMI data rather than raw meter data. Data will generally be available within approximately 24 to 48 hours after collection and validation.

   The Company currently anticipates the following:

   - Billing-quality usage data: updated within approximately 24-48 hours; up to twenty-four (24) months of historical data available.
   - Interval usage data: updated within approximately 24-48 hours following VEE processing; up to twenty-four (24) months of historical data available.
   - Bulk supplier data: provided on a recurring daily basis.

(b) The functional requirements that will inform the implementation of Green Button Connect, including the following:

1. Eversource anticipates a registration and onboarding process whereby third-party data recipients must:

   - Register through Eversource Energy's data sharing platform.
   - Provide company and user information.
   - Complete required certifications, attestations, and security reviews.
   - Execute applicable platform agreements and data protection requirements.
   - Receive Company approval prior to obtaining customer data access.

   For customer-authorized data sharing, approved third parties may submit authorization requests to customers through the platform. Customers may then authorize access using their existing utility account credentials through a single sign-on process.

2. For authorization and authentication, Eversource anticipates utilizing the Green Button Connect standard together with existing customer account authentication processes. Customers will authenticate using their utility credentials and will be able to grant, review, modify, and revoke authorizations through CL&P's customer-facing data sharing portal.

Third-party access will be limited to the scope, duration, and permissions established through the applicable customer authorization process.

For certain authorized market participants, such as competitive suppliers, Eversource anticipates supporting an opt-out data sharing framework, subject to regulatory approval. Under such a framework:

a) Customers associated with an authorized supplier may be automatically enrolled in data sharing.

b) Green Button authorizations may be established automatically based on the applicable customer relationship.

c) Customers would retain the ability to view, manage, and revoke such authorizations at any time through Eversource Energy's data sharing portal.

Accordingly, the anticipated framework would support authorization and authentication processes for groups of customers associated with approved entities, while preserving customer control through opt-out functionality.

1. Eversource anticipates requiring participating third parties to access customer usage data through its Green Button Connect platform to agree to the applicable terms, conditions, and cybersecurity requirements governing participation in the program.

   The specific requirements applicable to third parties are set forth in Eversource's:

   1. Cybersecurity Self-Attestation Requirements, available at: https://www.eversource.com/residential/account-billing/manage-bill/about-your-bill/share-usage-data/third-party-suppliers-terms/cybersecurity-self-attestation
   2. Third-Party Data Services Agreement, available at: https://www.eversource.com/residential/account-billing/manage-bill/about-your-bill/share-usage-data/third-party-suppliers-terms/third-party-data-services-agreement

   These documents set forth the requirements applicable to third parties, including, among other things, cybersecurity obligations, data protection requirements, confidentiality provisions, permitted uses of customer data, compliance obligations, audit and reporting requirements, and other conditions of participation. Third parties must satisfy the applicable requirements and agree to the governing terms and conditions prior to receiving customer data through the platform.

(c) Eversource uses the term "bulk data sharing" to refer to the provision of customer data to authorized entities, such as competitive suppliers for groups of customers rather than through individual customer-by-customer authorization workflows.

Eversource anticipates implementing bulk data sharing through a Green Button Connect-based platform that would:

a) Maintain approved third-party registrations.
b) Receive and process customer enrollment information.
c) Establish customer authorizations under an approved opt-out framework.
d) Deliver customer data files on a recurring basis.
e) Support API-enabled data exchange and retrieval.

Bulk data sharing is anticipated to be implemented as a component of the broader Green Button Connect data sharing framework.

(d) Eversource anticipates monitoring and reporting operational and performance information, including:

a) API transaction activity.
b) Data request volumes.
c) Request completion status.
d) Successful and failed transactions.
e) Error reporting and exception tracking.
f) User activity and transaction history.

(e) Yes. Eversource anticipates designing the platform using standardized Green Button Connect protocols and API-based architecture that can support future expansion and additional use cases.

Potential future applications may include:

a) Distributed Energy Resource ("DER") programs.
b) Demand response programs.
c) Energy benchmarking initiatives.
d) Load forecasting applications.
e) Additional authorized customer energy data services are approved through future regulatory proceedings.

The use of standards-based APIs is intended to facilitate future enhancements while allowing utility systems to remain the authoritative source of customer information.

(f) Yes. Eversource anticipates continuing stakeholder engagement throughout implementation of Green Button Connect and related data-sharing capabilities. This engagement may include collaboration with competitive suppliers, customer advocates, technology providers, PURA, and other interested stakeholders.

Eversource notes that the Green Button Connect standard was selected following stakeholder consultation, technical review, and regulatory guidance in other jurisdictions. Eversource expects stakeholder input to continue informing implementation activities, operational processes, performance expectations, and future enhancements to the platform.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence, Lavelle A. Freeman and Gerhard Walker**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 3-4, "Several capabilities can be realized with the commencement of AMI meter deployment, including power outage restoration, bulk data sharing, energy efficiency and demand management analytics, load research, transformer load management analytics, unbilled usage detection, VVO analytics, and remote connect/disconnect functionality".

a. Please describe how the Company intends to enable these capabilities with the commencement of AMI including the following:
   i. Does the Company intend to activate and leverage these capabilities on a region-by-region basis as AMI is deployed?
      1. If so, please describe the anticipated phases and cadence of deployment in which capabilities will be iteratively activated?
      2. If not, please describe the Company's approach to realizing capabilities with the commence of deployment.
b. Please confirm whether green button connect along with bulk data sharing would be implemented iteratively as AMI deployment occurs.
c. As part of implementing transformer load management analytics, does the Company intend to leverage AMI to iteratively develop 8760 hourly profiles at the substation, circuit and nodal level that can be incorporated into distribution planning and operations?

**Response:**

a. No, these capabilities are not implemented on a region-by-region basis. These capabilities will be deployed to the meters as soon as all the foundational back-office technology is built. These capabilities will be available to customers as meters are installed and come online.

   Please refer to page 43 in CLP-AMI-2 for further proposed AMI program timeline on incremental AMI deployment.

b. Eversource confirms that Green Button Connect will be implemented iteratively as AMI deployment occurs. We further expect that bulk data sharing capabilities will likewise be implemented on an iterative basis as underlying AMI functionality becomes available and

system integrations are completed during the deployment process, subject to applicable regulatory requirements and approvals.

c. The Company intends to use AMI meters and their data to maximize the capabilities thar are available within this technology, which includes creating 8760 profiles. Please refer to the Company's responses to OCC-587[i] and OCC-745[ii] for more information regarding this topic.

**Prior Referenced Responses:**

[i] OCC-587 Question:

Refer to Exhibit CLP-TSP-3 at 138, "Advancing the Grid, Planning Analytics - Advanced Forecasting Tools."

a. Please describe the milestones and timelines to integrate this tool into distribution planning if approved.
b. Please explain why existing forecasting tools cannot generate forecasted 8760 load shapes across all levels: substation, transformer, and at circuit levels

OCC-587 Response:

a. Based on the Company's experience, the procurement and deployment process will take 12-18 months from approval, and an addition 6 months to get the tools into full production.

b. Historically, time-series profile forecasts were not necessary to review capital projects and the single system peak was the most reliable forecast that could be produced. This is still valid today as the key input to capacity planning remains the magnitude of the peak, regardless of its time or date.

As iterated in the Company's responses to 21-05-15RE03 IDSP, there are also critical questions on the validity and cost benefit of creating an 8760 forecast as an 8760 forecast, by its very nature, not only forecasts the peak load and time of that peak load, but also the weather and load over the entire year.

While such profiles are useful for evaluating and sizing certain solutions (e.g., battery storage as an NWA, for which the Company can and does create 24-hour load profiles) they do not provide any incremental value for determining the scope of a substation project, and incur not insignificant incremental effort both on a technology and labor side. The Company has therefore not undertaken the full effort of creating such profiles given the incremental resources needed.

The existing tools the Company has in place were never designed nor intended to produce 8760 forecasts. This does not represent an insurmountable barrier but requires additional investments as the Company outlined in its comments to 21-05-15RE03 IDSP, which, without there being any documented proof in either proceeding that 8760 forecasts would quantifiably benefit the customer in a manner offsetting additional costs, requires the Authority to lay out cost recovery pathways for such efforts.

[ii] OCC-745 Question:

Refer to Exhibit CLP-AMI-2 at 8, "Figure 1 – Components of AMI Technology".

a. Please describe how the Company intends to leverage AMI to support distribution planning and operations including the following:
   i. Please describe whether the Company intends to leverage AMI to support the development of 8760 profiles at the substation, circuit and nodal level.
   ii. Please describe how the Company intends to use AMI to support real-time operations including the latency at which operational systems such as ADMS and DERMS will receive this data?

OCC-745 Response:

i. The Company intends to leverage AMI to substantially enhance its ongoing efforts to forecast demand at a granular, customer level. The Company has already begun developing customer-level technology adoption propensity models to project the penetration of EVs, heat pumps, and solar across its service territory. Presently, these efforts rely on third-party data and assumed load profiles in Connecticut, because the Company lacks observed data on adoption and usage for these customers. AMI would provide the Company with ground-truth data that is more reflective of the CL&P-specific customer base and service territory, thus meaningfully improving the accuracy of near-term forecasts and the Company's confidence in long-term forecasts.

   AMI would improve upon two specific limitations in the Company's current forecasting capability relevant to distribution planning.

   First, the Company is presently unable to determine, with a high degree of confidence, which individual customers have already adopted technologies such as EVs or heat pumps. Adoption is inferred through propensity modeling informed by third-party data sources rather than observed directly. AMI interval data would allow the Company to detect the load associated with these technologies at the individual meter, enabling adoption to be identified and validated against the Company's own aggregated system data. This present-day adoption would then be used to forecast future adoption with more accuracy than derived using present-day adoption data.

   Second, while the Company has SCADA telemetry, the Company currently has limited data on how these technologies affect granular load curves at a customer level once adopted. Generic or third-party-derived profiles may not accurately reflect the climate, housing types, customer types, rate structures, and adoption patterns specific to the Company's Connecticut service territory. AMI interval data would enable the Company to derive its own localized technology-specific load shapes directly from observed customer usage, vastly improving the accuracy of the inputs used to translate adoption forecasts into load forecasts. Put simply, the Company's ability to forecast the future development of its system is inherently constrained by its limited visibility into the present state of that system, and AMI would directly address that limitation.

   With regard to the development of 8760 profiles, please refer to the Company's response to OCC-575.

ii. Exhibit CLP-AMI-2 at 8, "Figure 1 – Components of AMI Technology" is intended to show AMI systems and their relationships. The arrows between the head end and meter data management systems and the ADMS and DERMS real time systems are intended to show potential future integrations that are not included in the Company's implementation plan. (Note that the integration with OMS is included in the implementation plan.)

---

As described in the response to OCC-747, "[t]he Company is currently investigating the technical feasibility, costs, and benefits of an AMI-informed DMS model, including the benefits for voltage optimization. Issues of data latency will be included in this investigation."

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 16-17, "Company concluded that a hybrid approach, utilizing a private wireless "mesh" network coupled with public carrier cellular networks, is the most effective technology for its electric AMI telecommunications network needs".

a. Please describe how the Company intends to use the mesh network vs. public carrier cellular networks including the following:
   i. Please confirm that public carrier cellular networks will be used to backhaul AMI data to the head end and meter data management system. If so, please describe the interval at which AMI data will be backhauled and the latency of the data transfer.

**Response:**

The AMI network uses a combination of mesh network technology and public cellular carriers to create the backhaul path. AMI meters form a mesh network where each meter can relay data for other meters, cost-effectively extending coverage and improving reliability. This mesh provides the local area network for AMI data backhaul. Access Points (APs) are AMI network devices that utilize the mesh network and public cellular carriers. APs aggregate and route traffic between AMI meters and the AMI head-end system using public cellular carriers. Public cellular carriers provide wide area network coverage.

AMI meter data is backhauled every 15 minutes. Data latency from a customer's meter to the head-end system averages less than 10 seconds in the Massachusetts AMI system.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence, Lavelle A. Freeman and Gerhard Walker**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 8, "Figure 1 – Components of AMI Technology".

a. Please describe how the Company intends to leverage AMI to support distribution planning and operations including the following:
   i. Please describe whether the Company intends to leverage AMI to support the development of 8760 profiles at the substation, circuit and nodal level.
   ii. Please describe how the Company intends to use AMI to support real-time operations including the latency at which operational systems such as ADMS and DERMS will receive this data?

**Response:**

i. The Company intends to leverage AMI to substantially enhance its ongoing efforts to forecast demand at a granular, customer level. The Company has already begun developing customer-level technology adoption propensity models to project the penetration of EVs, heat pumps, and solar across its service territory. Presently, these efforts rely on third-party data and assumed load profiles in Connecticut, because the Company lacks observed data on adoption and usage for these customers. AMI would provide the Company with ground-truth data that is more reflective of the CL&P-specific customer base and service territory, thus meaningfully improving the accuracy of near-term forecasts and the Company's confidence in long-term forecasts.

AMI would improve upon two specific limitations in the Company's current forecasting capability relevant to distribution planning.

First, the Company is presently unable to determine, with a high degree of confidence, which individual customers have already adopted technologies such as EVs or heat pumps. Adoption is inferred through propensity modeling informed by third-party data sources rather than observed directly. AMI interval data would allow the Company to detect the load associated with these technologies at the individual meter, enabling adoption to be identified and validated against the Company's own aggregated system data. This present-day adoption would then be used to forecast future adoption with more accuracy than derived using present-day adoption data.

Second, while the Company has SCADA telemetry, the Company currently has limited data on how these technologies affect granular load curves at a customer level once adopted. Generic or third-party-derived profiles may not accurately reflect the climate, housing types, customer types, rate structures, and adoption patterns specific to the Company's Connecticut service territory. AMI interval data would enable the Company to derive its own localized technology-specific load shapes directly from observed customer usage, vastly improving the accuracy of the inputs used to translate adoption forecasts into load forecasts. Put simply, the Company's ability to forecast the future development of its system is inherently constrained by its limited visibility into the present state of that system, and AMI would directly address that limitation.

With regard to the development of 8760 profiles, please refer to the Company's response to OCC-575[i].

ii. Exhibit CLP-AMI-2 at 8, "Figure 1 – Components of AMI Technology" is intended to show AMI systems and their relationships. The arrows between the head end and meter data management systems and the ADMS and DERMS real time systems are intended to show potential future integrations that are not included in the Company's implementation plan. (Note that the integration with OMS is included in the implementation plan.)

As described in the response to OCC-747[ii], "[t]he Company is currently investigating the technical feasibility, costs, and benefits of an AMI-informed DMS model, including the benefits for voltage optimization. Issues of data latency will be included in this investigation."

**Prior Referenced Responses:**

[i] OCC-575 Question:

Refer to Exhibit CLP-TSP-2 at 21-22, "Historical System Load Analysis."

a. Please describe the temporal granularity (i.e hourly etc.) of the historical loading information used to inform the Company's load forecast and whether this varies depending on location and data availability.
b. Please describe the percentage of substations and associated feeders with available 8760 hourly profiles. If some or all of the substations and associated feeders do not have 8760 hourly profiles, please describe whether and when the Company plans to have 8760 profiles available.

OCC-575 Response:

a. To create the substation peak forecast the Company relies on the peak hour values which are determined from 15 min SCADA data by substation and at the system level.

b. Please refer to the Company's response to information request OCC-587i. The Company currently does not create 8760 load forecast profiles. Where SCADA data is available1, the Company does have historical 8760 "as measured" data. The Company currently has no plans absent approval of requested resources as presented

in the Exhibit CLP-TSP-3 at 138. Here, the Company has outlined a pathway to develop the resources needed for the full capabilities to provide 8760 data within 18 to 24 months.

[ii] OCC-747 Question:

Refer to Exhibit CLP-AMI-2 at 38, "Once the VVO control system can accept AMI voltage data directly, the Company will develop an integration between the VVO control system and the MDMS, allowing the VVO system to respond to voltage violations (below or above stated thresholds) automatically."

a. Please describe the latency at which the Company's VVO control system will receive AMI data.
b. Please describe how VVO will be coordinated with the DERMS demonstration on centralized voltage management.

OCC-747 Response:

a. As noted in CLP-AMI-2 at 38, the integration between the VVO control system and MDMS has not yet been developed. Accordingly, the latency at which the Company's VVO system will receive AMI data has not yet been determined.

   The Company's VVO control system will be an application known as load voltage management ("LVM") within its distribution management system ("DMS"). The DMS is a real-time application, using real-time telemetry from substations and field devices to provide system operators with as-operated load flow tools. As AMI represents millions of data points, integration of real-time AMI telemetry into DMS/LVM is a technical challenge that will require significant design and testing.

   The Company expects the use of AMI data to support real-time VVO operations will occur in phases. As described in CLP-AMI-2 at 38, the first phase will be operational dashboards using recent (not real-time) AMI data to support assessments of VVO operations for the purpose of improving use of the DMS/LVM for voltage optimization. Second, AMI data will be used to improve the accuracy of load profiles used to inform DMS load allocation. This will increase the accuracy of the DMS load flow, which will improve the functionality of all DMS applications, including LVM. The third step would be the use of real-time AMI telemetry to inform the DMS model. The Company is currently investigating the technical feasibility, costs, and benefits of an AMI-informed DMS model, including the benefits for voltage optimization. Issues of data latency will be included in this investigation.

b. The opportunity to include VVO in the DERMS demonstration (in coordination with the Grid Services Compensation Fund) focuses on the use of DERMS to operate advanced inverters from customer DER, including solar and battery energy storage, via the DERMS to support reactive power management. The objective would be to assess the technical feasibility, costs, and benefits of incorporating customer DER in the Company's VVO operations, using the DMS/LVM tools described above, to test the hypothesis that use of existing DER to manage voltage will result in net cost savings for customers.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence, Lavelle A. Freeman, Juan F. Martinez and Steven C. Osuch**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 39, "The Company can potentially use this information to identify the locational value of DERs".

a. Please describe whether the Company has developed a methodology to determine the locational value of DERs and if so, please provide this methodology.
b. Please provide a timeline for when locational value will be implemented.

**Response:**

The locational value of DER is dependent on their ability to defer or avoid infrastructure investments. Said differently, a DER developed on a portion of the distribution system with no constraints, full capacity to support all operations without limitations, and no such constraints within the forecast horizon does not provide any locational value. In this case, the only value is on the bulk system side, (for example to displace conventional generation); a benefit, however, that is not locationally bound.

a. The Company uses a standard value of deferral methodology to determine the value of a DER at a specific location → see the NWA process BCA Framework.[1]

b. The locational value calculation for DER has been implemented first as part of the Company's NWA Framework and more recently as part of the Authority's NWA Process.

[1] https://www.eversource.com/docs/default-source/doing-business/appendix-13-nws-bca-reference-manual.pdf?sfvrsn=10469df6_2

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence and Jennifer A. Schilling**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 38, "Once the VVO control system can accept AMI voltage data directly, the Company will develop an integration between the VVO control system and the MDMS, allowing the VVO system to respond to voltage violations (below or above stated thresholds) automatically."

a. Please describe the latency at which the Company's VVO control system will receive AMI data.
b. Please describe how VVO will be coordinated with the DERMS demonstration on centralized voltage management.

**Response:**

a. As noted in CLP-AMI-2 at 38, the integration between the VVO control system and MDMS has not yet been developed. Accordingly, the latency at which the Company's VVO system will receive AMI data has not yet been determined.

   The Company's VVO control system will be an application known as load voltage management ("LVM") within its distribution management system ("DMS"). The DMS is a real-time application, using real-time telemetry from substations and field devices to provide system operators with as-operated load flow tools. As AMI represents millions of data points, integration of real-time AMI telemetry into DMS/LVM is a technical challenge that will require significant design and testing.

   The Company expects the use of AMI data to support real-time VVO operations will occur in phases. As described in CLP-AMI-2 at 38, the first phase will be operational dashboards using recent (not real-time) AMI data to support assessments of VVO operations for the purpose of improving use of the DMS/LVM for voltage optimization. Second, AMI data will be used to improve the accuracy of load profiles used to inform DMS load allocation. This will increase the accuracy of the DMS load flow, which will improve the functionality of all DMS applications, including LVM. The third step would be the use of real-time AMI telemetry to inform the DMS model. The Company is currently investigating the technical feasibility, costs, and benefits of an AMI-informed DMS model, including the benefits for voltage optimization. Issues of data latency will be included in this investigation.

b. The opportunity to include VVO in the DERMS demonstration (in coordination with the Grid Services Compensation Fund) focuses on the use of DERMS to operate advanced inverters from customer DER, including solar and battery energy storage, via the DERMS to support reactive power management. The objective would be to assess the technical feasibility, costs, and benefits of incorporating customer DER in the Company's VVO operations, using the DMS/LVM tools described above, to test the hypothesis that use of existing DER to manage voltage will result in net cost savings for customers.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 49 "The Company also plans to run a high impedance detection for distribution intelligence pilot, which will leverage grid-edge data from AMI to identify potential high impedance fault conditions or abnormal system behavior".

a. Please describe what other distributed intelligence capabilities the Company intends to pilot and leverage for planning and operations.

**Response:**

Eversource has identified several distributed intelligence capabilities for evaluation which includes load disaggregation, and transformer monitoring. Eversource is currently conducting pilot programs within the Massachusetts program deployment.

Load disaggregation provides EV awareness, which monitors consumption, and solar awareness, which monitors generation, in the form of pilot programs. These programs will enable the capability to identify behind the meter EV or solar, and can subsequently provide session data such as power generation, power consumption, peak power, and total power.

Transformer monitoring enables real time voltage and load characteristics of distribution transformers. This is calculated instantly by the meters and electrically connected to the same transformer.

These applications provide Eversource with granular data that can better understand how behind the meter solar and EV devices affect grid performance. Pending PURA approval, the technology that is currently available in Massachusetts would be available to benefit Connecticut customers.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 16-17, "The latest generation AMI mesh networks enable powerful smart meters with enhanced processing and memory capabilities to run applications and securely share data among peer meters. These enhanced capabilities allow the meters to interpret the scope of a network outage, rapidly sample and interrogate voltage quality, and provide insight into the general health of the electric network. This new AMI architecture has enabled multiple new use cases and enhanced existing ones".

a. Please describe the latency of at which meters can securely share data among peer meters.
b. Please describe the latency at which the Company can have insight into the general health of the electric network and respond if there are adverse conditions.
c. Please describe what if any new use cases this AMI architecture enables beyond the described distributed intelligence capabilities.

**Response:**

a. Meters can communicate across the mesh network instantaneously, with transfer speeds for peer-to-peer communications that can go up to 600kbps.

b. Outages or adverse events are detected by AMI meters instantaneously, and the frequency of detection is based on prioritization as dictated by the Company. Responses are managed in the same manner as received.

c. At present, distributed intelligence architecture enables the use cases as described in CLP-AMI-2. However, a benefit of the distributed intelligence architecture that is deployed as part of the Massachusetts AMI program is that future application development can enable new outcomes which includes the potential for use-cases that are not yet known but will be developed and evolve as meter technology changes. These applications can be deployed over-the-air, at scale quickly and do not require field visits.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 47, "Figure 12 – Proposed CT Meter Deployment Sequence".

a. Has the Company considered prioritizing the deployment of AMI in locations with DER and load constraints so that better data is available to inform solutions?

**Response:**

The hybrid mesh technology of the AMI Plan is best deployed by installing meters in concentrated locations and then expanding in adjacent areas, as doing so is the most cost-efficient path to overall stability and full benefits coverage. During its AMI rollout in MA, Eversource identified opportunities to prioritize areas with load constraints that could be accelerated without introducing costly inefficiencies to the deployment. Eversource expects that it would adopt a similarly agile approach for CL&P.

Date Filed: September 28, 2026

**Witness: Jared A. Lawrence, Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

Refer to Exhibit CLP-AMI-2 at 5, "Time-varying rates rely on interval usage data, advanced billing system functionality, customer access to timely consumption information, and robust customer education and engagement programs. AMI provides the technological foundation necessary to support future time-varying rate offerings, including time-of-use, critical peak pricing, and other demand-responsive rate designs. However, these capabilities cannot be fully, equitably realized until AMI meters have been installed and activated for the majority of customers and the supporting data management, communications, and billing systems have been fully integrated and tested".

a. Please explain why TVR cannot be implemented upon commencement of AMI deployment similar to capabilities including power outage restoration, bulk data sharing, energy efficiency and demand management analytics.
b. Please explain when the Company intends to develop and file proposals to implement time-of-use, critical peak pricing, and other demand-responsive rate designs.

**Response:**

a. If PURA approves the Company's proposal to leverage the MA technology platforms for CT, the capabilities will exist upon "go-live" of the foundational systems (CIS, MDMS) and the completion of the AMI network, subject to testing for the CT deployment. However, while the technical capabilities will exist at the start of the AMI meter deployment (subject to testing), the Company is proposing a timeline based on the equally important change management and customer education considerations for a successful TVR launch. Accordingly, the Company recommends the convening of an inclusive stakeholder process once AMI meter installation begins so that actual customer interval usage data can be used to evaluate TVR options and reach consensus conclusions on rate design and effective communications. Further, the Company's AMI Implementation Plan includes the development of a Rate Comparison Tool that will help customers evaluate their TVR options based on customized analysis and recommendations, which will be reliable only after they amass sufficient interval usage data after receiving their meters. This will allow customers to fully understand their options and make informed selections of the TVR rate that best meets their individual goals. Not only does the Company's proposed timeline allow for a more positive customer experience based on customized

TVR analyses and recommendations, it also ensures that all customers (who have not opted out off AMI) are eligible to enroll in TVR at the time the broad Marketing, Education and Outreach Plan enters the TVR rollout phase.

b. As noted in OCC-422[i], the Company plans to file an opt-out TVR proposal by October 1, 2027, while additionally presenting the merits of an opt-in approach to TVR given the status of AMI implementation at that time. Additionally, as noted above, the Company recommends the convening of an inclusive stakeholder process once AMI meter installation begins so that actual customer interval usage data can be used to evaluate TVR options and reach consensus conclusions on rate design. Based on this recommended stakeholder process, the Company would then file an additional TVR rate proposal during the AMI meter installation period so that PURA approval would be obtained in time to educate customers and launch the rate(s) approximately one year after completion of AMI meter installation.

**Prior Referenced Response:**

[i] OCC-422 Question:

Please refer to Exhibit CLP-Rates-1, p. 12, in which the Company states that it developed a time-varying rate (TVR) Outreach, Education, and Engagement plan "in consultation with the OCC."

a. Please confirm that OCC and Eversource only met once, on July 1, 2026, and OCC explained it had not had time to do a complete review of the proposed Outreach, Education, and Engagement Plan.
b. Please confirm that in the meeting on July 1, 2026, OCC explained that Public Act Section 20 requires the Company to file an opt-out TVR proposal no later than October 1, 2027.
c. Please confirm that in the meeting on July 1, 2026, OCC indicated it had concerns about issuing the Outreach, Education, and Engagement Plan for an opt-in only TVR if the law requires the Company to file an opt-out TVR only months after the current rate case's decision.
d. Please confirm that in the meeting on July 1, 2026, OCC explained that it could not "approve" the Outreach, Education, and Engagement Plan as proposed, without additional information about the types of TVR being implemented.
e. Please explain how the Company intends to comply with Public Act Section 20.

OCC-422 Response:

On June 10, 2026, the Company provided a copy of the draft TVR Customer Engagement Plan to the OCC and DEEP, and requested to meet with both parties to further develop the plan with their consultation, in accordance with Section 21 of Public Act No. 25-173. The Company met with DEEP staff on June 25, 2026, and met with OCC staff on July 1, 2026. Please refer to OCC-422, Attachment 1, and OCC-422, Attachment 2, for the Company's minutes of the respective meetings.

By providing the draft TVR Customer Engagement Plan to both DEEP and OCC on June 10, 2026, and by meeting with both parties to on June 25, 2026, and July 1, 2026, respectively, to solicit and incorporate any feedback they wished to provide, the Company complied with Section 21 of Public Act No. 25-173.

In this discovery request, OCC notes that it could not "approve" the TVR Customer Engagement Plan. The Company agrees. Section 21 of Public Act No. 25-173 required the Company to design and file a "comprehensive customer education and engagement program" in CL&P's pending rate case. Section 21, part (b), indicates any approval of the program required pursuant to Section 21 parts (a) and (b) would come from PURA.

Because the Company's AMI Implementation Plan has not been approved, nor have any AMI-enabled TVR proposals, the TVR Customer Engagement Plan filed in compliance with Section 21 focuses on the existing portfolio of TVR options and necessarily addresses broad AMI-enabled TVR at a high level.

Regarding Section 20, which involves different compliance obligations to be completed by October 1, 2027, CL&P will fully comply with the requirement in Section 20 to file an opt-out TVR proposal by October 1, 2027, while additionally presenting the merits of an opt-in approach to TVR given the status of AMI implementation at that time. As noted in Exhibit CLP-AMI-1, at page 11, "AMI, and its ability to track customer usage by the hour (or potentially even smaller increments), is a prerequisite to implementing time-varying rates as envisioned by Public Act No. 25-173, as codified in Conn. Gen. Stat. §§ 16-19f and 16-243n."

There, in footnote 1, the Company further explained:

> The Company must first implement AMI and gain baseline information and learning on its customers use before the advanced TVR as imagined by Conn. Gen. Stat. §§ 16-19f and 16-243n can be implemented. CL&P will undertake a TVR review and analysis once AMI meters are deployed and the Company has been able to collect requisite information, consistent with the requirement in § 16-243n(b) that the design of such rates, including the price differential between on-peak and off-peak time-varying rates, shall be consistent with empirical research conducted by the electric distribution company. Until then, existing TVR and any proposed interim TVR options submitted to be compliant with the October 1, 2027, deadline in § 16-243n will be bridge solutions only. Advanced TVR offerings require the functionalities of AMI, and therefore the Company anticipates that the ultimate AMI meter deployment schedule will dictate the Company's ability to request approval for advanced TVR offerings for all customers as imagined by Conn. Gen. Stat. §§ 16-19f and 16-243n.

As the Company details in its filed AMI Implementation Plan, Exhibit CLP-AMI-2, a comprehensive Customer Outreach and Engagement Framework, based on the actual details of available rate options and the customer engagement technologies developed, will be a critical part of a successful AMI rollout that culminates in the development of TVR capabilities for all customers after AMI meter installation is complete.

The Company recommends the convening of an inclusive stakeholder process once AMI meter installation begins so that actual customer interval usage data can be used to evaluate TVR options and reach consensus conclusions. Further, the Company's AMI Implementation Plan includes the development of a Rate Comparison Tool that will help customers evaluate their TVR options, whether opt-in or opt-out, which will be available as they amass interval usage data after receiving their meters. As the Company's AMI Implementation Plan proposes that TVR be launched for all customers after they have adequate usage history (e.g., 1 year) to evaluate their TVR options, the updated comprehensive and detailed Customer Outreach and Engagement Framework tied to the future TVR options and customer engagement technologies will be developed over the next 3-5 years.

Date Filed: September 28, 2026

**Witness: David L. Gladey and Jeffrey Richard**
**Request from: Office of Consumer Counsel**

**Question:**

Please refer to the Response to OCC-151. Please separate the response into amounts greater than 30 days past due, greater than 60 days past due, and greater than 90 days past due.

**Response:**

Please refer to OCC-752, Attachment 1, for the requested information.