Date Filed: October 08, 2026

Witness: Warren R. Boutin and Andrew C. Belden
Request from: ALLCO

Question:

(Follow-up to ICC-005 and ICC-010 — monthly PowerClerk Reports and the executable-IA policy.) The Company's response to ICC-010 states that "[m]anagement receives a monthly PowerClerk Report where Process timelines are reviewed to ensure that the timelines are adhered to," and its response to ICC-005 states that "[t]he EDC cannot issue an executable Interconnection Agreement until applicable ISO-NE requirements are met." (a) Produce each monthly PowerClerk Report, in native format, from January 1, 2020, to the present, and identify each metric, timeline, and milestone it reports and the recipients of the report. (b) State the date on which the Company adopted the policy that it will not issue an executable Interconnection Agreement until ISO-NE requirements are met, identify the Guideline provision, PURA order, ISO-NE tariff provision, or other authority on which it rests, and identify the document in which the policy is recorded. (c) For each Allco Application, state whether that policy was applied, the date the Company determined ISO-NE requirements had or had not been met, and the date, if any, on which the Company communicated that determination to the applicant. (d) State whether the policy in (b) is applied to applications of 1 MW or less, and if not, identify the Company's basis for treating LEG-22708 and LEG-22709 (or any other Allco Application of 1 MW or less) as subject to ISO-NE review.

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.

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, the monthly PowerClerk Reports referenced is not a formal report, but an internal tool used to review performance and to strategize for future success. Section 1.2 of the PURA-approved Interconnection Guidelines states, in part, "At the conclusion of the studies including any Transmission studies or additional requirements from ISO-NE, the EDC will submit an Interconnection Agreement (IA) to the Generator with payment milestones included

within the Agreement." Also, Section 3.2 of the PURA-approved Interconnection Guidelines states, in part, "If there are additional requirements set forth by ISO-NE for any proposed Generating Facility, these requirements will need to be addressed and receive proper approval by ISO-NE prior to the EDC issuance of an executable Interconnection Agreement." This procedure is under the jurisdiction of ISO-NE. The Generator may obtain guidance from the ISO-NE Tariff, Schedules 22 and 23 and Section I.3.9.