Date Filed: September 16, 2026

Witness: Andrew C. Belden
Request from: ALLCO

Question:

Describe the Company's policy, practice, and decision-making process for determining whether a distribution-connected resource under five megawatts is registered in the ISO-New England markets or treated as an unregistered load reducer, including who (by title) makes that determination, the criteria applied, any ISO-New England or NEPOOL rules the Company contends require registration, and every analysis the Company has performed of the customer-cost consequences of registering versus not registering such resources. Produce all such analyses.

Response:

PURA's June 2, 2026, Notice of Proceeding in Docket No. 26-05-10 states that, upon a receipt of a completed application from Eversource to amend the Company's existing rate schedules, PURA will conduct a contested proceeding to review Eversource's application. Eversource objects to Allco's effort to litigate an issue that is outside the scope of this rate case proceeding. Considering the statutory 350-day timeframe to issue a final decision on the Company's application and the number of interrogatories issued in this proceeding to-date, the litigation of issues irrelevant to the Company's application threatens to adversely impact the orderly conduct of this proceeding.[1]

Without waiving said objection, the Company's general practice has been to treat distribution-connected resources under 5 MW as unregistered load reducers. Treating such resources as load reducers is administratively efficient and produces benefits for customers by reducing wholesale load obligations. PURA approved the continuation of this practice for current renewable programs in its Docket No. 20-07-01, June 30, 2021, Final Decision ("Docket No. 20-07-01 Decision"),[2] and the Company is not aware of any ISO-New England or NEPOOL rules that prohibit treating resources under 5 MW as load reducers.

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[1] Allco previously litigated renewable energy projects as load reducers in the Company's Docket No. 24-01-03 Revenue Adjustment Mechanism proceeding. See, Docket No. 24-01-03, Eversource responses to ALLCO-04 and ALLCO-027. Eversource objected to both of these questions.

[2] See, Docket No. 20-07-01 Decision at 41.