Date Filed: September 16, 2026

Witness: Andrew C. Belden and Justin Pelkowski
Request from: ALLCO

Question:

Quantify the additional annual savings, by cost category (standard service procurement quantities, RNS, LNS, TAC, capacity, and reserves), that customers would realize (or would have realized in each year 2020 through 2025) if all eligible resources under five megawatts were treated as unregistered load reducers rather than registered in ISO-New England, and produce every study, analysis, or estimate the Company has made of that question. If the Company has never analyzed it, so state.

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, substantially all eligible resources under 5 MW were treated as unregistered load reducers rather than registered in ISO-NE from 2020 through 2025. The Company cannot quantify savings relative to what actually occurred.

[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.