STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**SEPTEMBER 10, 2026**

THE OFFICE OF CONSUMER COUNSEL'S SIXTEENTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **September 24, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-604 through OCC-710 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-604. (CUSTOMER COMMUNICATIONS) Does the Company employ and/or use a disability coordinator or the position's equivalent to ensure communications are accessible to all customers? If yes, please explain.

OCC-605. (STORM OVERTIME) For the test year, please provide the amount of overtime worked by each exempt employee by storm (i.e., do not provide a total amount worked for the year, but the amount per employee per each storm).

OCC-606. (CUSTOMER SERVICE) Please provide key insights from J.D. Power's external customer research on customer perceptions of Eversource and other utility providers. Based on the external research the Company subscribes to, how do

customer perceptions of Eversource compare to perceptions of other utility providers across the country?

OCC-607. (CUSTOMER SERVICE) What notable patterns in customer perceptions of Eversource have been identified, based on the Company's own customer perception surveys and insights gained from external research? How has customer perception of Eversource changed in the past 6 years? What potential reasons have been identified for customer views changing or remaining constant?

OCC-608. (CUSTOMER SERVICE) What pre-pandemic trends in customer perceptions of Eversource has the Company identified? Have there been significant shifts since the onset of the COVID-19 pandemic?

OCC-609. (CYBERSECURITY COSTS) In an unlocked Excel spreadsheet, please identify all costs included in the Test Yar associated with cybersecurity measures, noting the filing/line in which that cost is contained and explaining the work associated with that cost.

OCC-610. (VARIABLE PAY) Please refer to EMPLOYEE-CLP-1, Table 8. The "Strategic Financial Incentives and Regulatory Outcomes" are "Regulatory filings, storm cost recovery and strategic positioning."

a. Please explain all specific regulatory filings that factored into this metric;
b. Please confirm if "storm cost recovery" referred to Docket No. 25-12-13 and, if so, explain how this was measured to have been met;
c. Please explain "strategic positioning" and indicate how this was measured to have been met.

OCC-611. (VARIABLE PAY) Please refer to EMPLOYEE-CLP-1, Table 8 and the Response to OCC-198, Attachment 1. Each year from 2018 through 2023 had a separate table. Please explain if Table 8 reflects 2024 metrics or 2025 metrics and provide whichever year Table 8 does not reflect.

OCC-612. (VARIABLE PAY) Please refer to EMPLOYEE-CLP-1, Table 8 and the Response to OCC-196, which explains that Table 8 refers to Eversource-level goals.

a. Please identify which goals included in Table 8's "Key Strategic Financial and Regulatory Results" and "Key Strategic Customer and Clean Energy Operational Results" included results from Connecticut and explain how those goals were met.

b. Please explain how Connecticut factored into the remaining Operational Performance goals in Table 8 (e.g., what was Connecticut's average MBI, SAIDI, etc…).

OCC-613. (VARIABLE PAY) Please refer to CLP-EMPLOYEE-3.

a. Please confirm that every employee with a rating of "Improvement Needed to be a Successful Contributor" or higher received a variable pay award in the Test Year.
b. Please confirm that every employee with a rating of "Improvement Needed to be a Successful Contributor" or higher received a merit raise in the Test Year.

OCC-614. (VOLUNTARY SEPARATION) For each employee who voluntarily separated from the Company in 2025, please indicate the employee's position and the stated reason for separation.

OCC-615. (POLES) Please refer to Exhibit CLP-TSP-1, p. 27, which states that many wood poles "do not meet current strength standards." Please clarify:

a. Of the total number of poles, what percentage are wood poles?
b. What are the sources of the loads on the poles?
c. To the extent some loads result from communications wires, has the Company studied the allocation of load attributable to each source (i.e., does the Company know the amount of load associated with each type of wire on the pole)? If so, please provide.
d. Would the poles meet current strength standards if they contained only electric lines?

OCC-616. (MS24E - Allocation) Please refer to the Response to EOE-13, Attachment 1. Please explain how the Company determined how to allocate costs between MS24E and MN24F011.

OCC-617. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 1. Please explain the work associated with this invoice and why the work occurred more than one month after the event.

OCC-618. (MS24E - Standby) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 19. Please confirm that the workers on this invoice charged for being on standby from 6 am through 10 pm on March 11, 2024, and did not perform any work associated with this event.

OCC-619. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 20. The times allocated in the "Work Distribution" section of the form overlap and cannot apply to all workers. Please explain how the Company verified that all workers listed on this form worked for 12 hours.

OCC-620. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 21. The description of the 10 hours of work performed by 8 workers and 7 trucks is "Transfer FTR set pole install new st light."
a. Please explain how this work is related to the storm and why the number of vehicles and number of workers was necessary.
b. Please explain why the workers/vehicles billed for 10 hours but the start time was 6:30 and the end time was 11:00. If work was not performed at this location/job for the entire 10 hours, please explain what occurred for the remaining 5 ½ hours billed.

OCC-621. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 22-23.
a. Please explain if "Car Vs pole Frontier pole…" was considered work associated with the storm and is included in the requested recovery.
b. Please provide the cost associated with the "Car Vs. pole Frontier pole…" entries.

OCC-622. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 22. The times allocated in the "Work Distribution" section of the form overlap and cannot apply to all workers. Please explain how the Company verified that all workers listed on this form worked for 11 hours.

OCC-623. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 25.
a. The start time indicated in box 6 is 5:30 am, however, the start time indicated in box 24 is 13:30. Further, the crew billed for 7 hours of standby and 10.5 hours of work time (two crew members billed for 9 hours of work time). Please reconcile the start times and the total work time.
b. Please confirm that the only work performed during the 17.5 hours billed was the work from 17:00 to 12 am.

OCC-624. (MS24E - Standby) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 27. This crew billed for only standby. Where did the standby occur?

OCC-625. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 29. Please explain why the second entry did not have a ticket.

OCC-626. (MS24E - Timesheets) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 45-48. Please explain why these timesheets differ from the template and how the Company verified the number of hours worked by each employee on each work order.

OCC-627. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 52. Please explain why standby work performed at the Torrington WC on March 28, 2024, was charged to the MS24E event.

OCC-628. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 53-63. The work associated with this invoice was performed on March 18-20, 2024. Please explain how the Company verified the work resulted from event MS24E.

OCC-629. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 65-66. Please confirm that this crew was on standby throughout March 11 and March 12, 2024, performed no work, and was paid overtime.

OCC-630. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 67-72. The timesheets were corrected to reflect time billed to MS24E rather than MN24F. Please explain:

a. Who corrected the timesheets?
b. On what basis (what evidence) were the timesheets corrected to bill these crews who incurred nothing but standby expenses on March 12 to MS24E?

OCC-631. (MS24E) Please refer to the Response to Exhibit ACCT-2(CLP-5A-01)(MS24E) p. 218-254.

a. Did the vendor Central Connecticut Cable Company perform any work or did they bill for standby for the two days?
b. If they billed for work, please indicate where the work was noted on their timesheets.

OCC-632. (MS24E) Please refer to the Response to Exhibit ACCT-2(CLP-5A-02)(MS24E) p. 84-85.

a. The work associated with these invoices was performed for ten days after MS24E. Please explain how the Company verified the work resulted from event MS24E.
b. Please refer to p. 84. Please explain how replacing a rotten pole was attributed to MS24E.

OCC-633. (MS24E) Please refer to the Response to Exhibit ACCT-2(CLP-5A-02)(MS24E) p. 115, which lists in the description of work "communication line down."

a. Did the Company reinstall/repair a communication line?
b. If yes to a, did the Company recover this cost from the communications company?

OCC-634. (Storm MN25K - Timesheets) Refer to Exhibit ACCT-2 (CLP-13A-16) (MN25K). The following pertains to invoices #3634R, 3635R, 3633R, 3648R, 3646R, and 3644R (p. 30-173) and invoices #3630R, 3643R1, 3639R2, and 3636R1 (208-285):

a. Several timesheets (ex. p. 38) contain missing information within the 'Work Distribution' section. Explain how the Company verified and justified the work performed for the hours stated in box 12 (Work Time) without event information to indicate time worked.
b. Several timesheets (ex. p. 37) contain a difference in hours worked in boxes 6 and 7 (start time and end time) compared to boxes 24 and 25 (event start time and event end time). Explain what work occurred during the time differential including the event details, the event start time, the event end time, and any documentation over the work performed. Cite to the contract provision contained in the contracts provided in Response to OCC-44 explaining that the tasks noted should be logged as work and not standby.

OCC-635. (Storm MN25K - Timesheet) Refer to Exhibit ACCT-2 (CLP-13A-16) (MN25K). The following pertains to invoice #3630R (p. 208-226):

a. Per review of the work descriptions, p. 214, the last event noted 'MTV sub crews released with no tasks performed'. Explain how the Company gained comfort over the total billable hours within the report given the release of the crew prior to the end time in box 7.
b. Per review of the work descriptions, p. 215, the last event noted 'Not completed: crews released from job by system dispatch'. Explain how the Company verified the total billable hours within the report given the release of the crew prior to the end time in box 7.

OCC-636. (Storm MN25K – Invoice) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to invoice #EV022725R (p.186-199):

a. Per invoice, the work date period is from 2/17/2024 to 2/19/2024, however, MN25K occurred in February of 2025, and the work performed by the crew was from 2/17/2025 to 2/19/2025. Confirm the work period for this invoice. If the work period was for 2024, why was the invoice considered as part of MN25K?

b. Per inspection of the invoice and comparison to the vendor contract provided as part of OCC-044 Attachment 2 CONFIDENTIAL, p. 5080-5103, the invoice recorded cost per unit based on the 2024 rates within the contract (5089-5098) instead of the 2025 rates within the contract (p. 5100-5103). If the work in this invoice was associated with a 2025 storm, explain why this vendor charged the 2024 rates on this invoice for the work performed on MN25K instead of the 2025 rates that were listed as part of the contract and why those rates were accepted.

OCC-637. (Storm MN25K – Service Crew) Refer to Exhibit ACCT-2 (CLP-13A-6) (MN25K). The following pertains to invoice #12960R1 (p. 1-27). Several timesheets (ex. p. 6) contain a difference in hours worked based on boxes 6 and 7 (start time and end time) and boxes 24 and 25 (event start time and event end time). Explain what work occurred during the time differential including the event details, the event start time, the event end time, and any documentation over the work performed. Cite to the contract provision contained in the contracts provided in Response to OCC-44 explaining that the tasks noted should be logged as work and not standby.

OCC-638. (Storm MN25K – Service Crew) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to invoice #WO-13990 (p. 200-221):

a. Per inspection of the documentation, there were no Time & Work Reports that recorded supervisor hours or the equipment utilized by the supervisors. Provide an explanation of the hours allocated to the supervisors on the invoice and provide the associated Time & Work Report for the hours worked.
b. The timesheets on p. 201-218 contain no approval by the Eversource Representative. Explain the reason for the lack of approval by the representative and how the Company validated the work without that approval.
c. Several timesheets (ex. p. 201) contain no event start time and event end time. Explain how the Company verified and justified the work performed for the hours stated in box 12 (Work Time) without event information to indicate time worked.

OCC-639. (Storm MN25K – Service Crew) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to invoice #WO-13989R2 (p. 222-243):

a. The timesheets on p. 224-243 contain no approval by the Eversource Representative. Explain the reason for the lack of approval by the representative and how the Company validated the date work was performed without that approval.
b. Several timesheets on p. 224-243 contain no event start time and no event end time. Explain how the Company verified that the work performed by workers

for the hours stated in box 12 (Work Time) without the event start times and end times to indicate time worked.

OCC-640. (Storm MN25K – Tree Crews) Refer to Exhibits ACCT-2 (CLP-13A-9) (MN25K), ACCT-2 (CLP-13A-10) (MN25K), and ACCT-2 (CLP-13A-11) (MN25K). The following pertains to invoices from Lewis Tree Service Inc:

a. Exhibits ACCT-2 (CLP-13A-9) (MN25K), ACCT-2 (CLP-13A-10) (MN25K), and ACCT-2 (CLP-13A-11) (MN25K) - Several invoices (ex. invoice #445493 p. 154 Exhibit ACCT-2 (CLP-13A-10) (MN25K)) note hours recorded within the Tree Contractor Work Location report on days that were not charged per the invoice and weekly operations summary report. How did the Company validate the work performed by these crews and the hours charged given inconsistency between the reports?

b. Exhibits ACCT-2 (CLP-13A-9) (MN25K) and ACCT-2 (CLP-13A-10) (MN25K) - Several invoices (ex. invoice #445115 p. 80 on Exhibit ACCT-2 (CLP-13A-10) (MN25K)) indicated standby time for the hours charged by the crew. Per review of the vendor contract provided as part of OCC-044 Attachment 2 CONFIDENTIAL p. 3228, "Standby Rates apply to labor resources only". Given this information, explain the reason for allowing equipment to be charged for the time crews were on standby when the contract allows for only labor. If additional information was considered at the time of the invoice and related to the equipment hours, please provide. How did the Company track the hours held on standby for those crews that only recorded a portion of their time to standby?

c. Exhibit ACCT-2 (CLP-13A-11) (MN25K) – Per review of invoices (ex. invoice #446544 p. 56), hours were charged for work performed 5-16 days after the storm event had occurred per Exhibit CLP-STORM-IMT-3 (Event 13-MN25K). How did the Company ensure that the hours charged, and work performed by these crews were related to the storm event? If additional information was provided at the time of deployment or receipt of invoice to validate the work performed in relation to storm MN25K, please provide.

OCC-641. (Storm MN25K – Tree Crews) Refer to Exhibit ACCT-2 (CLP-13A-8) (MN25K). The following pertains to invoices from Distinctive Gardens & Tree Care LLC (p. 31-52):

a. Per review of the vendor contract provided as part of OCC-044 Attachment 2 CONFIDENTIAL p. 1000-1127, the contract indicates different rates for 2025 than those applied on the invoices. Provide context on whether any additional factors or considerations were applied in calculation of the rates.

b. The hours charged per invoices did not align to the hours recorded per the Tree Crew Time Sheet reports. Was the differential attributable to standby time or another non-work function? Were the time sheets completely properly by the crew/vendor? How did the Company validate the work performed by these crews and the hours charged?

OCC-642. (STORM MN25K – Food & Lodging) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). Invoice #7690, p. 244-245, noted food for the date 2/18/24. Please confirm if this is correct. If the date is correct, why was it included in the storm event MN25K?

OCC-643. (STORM MN25K – Food & Lodging) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). Invoice #00401, p. 247, noted an order date of 2/18/25 and invoice date of 2/20/25, however a payment due date of 12/31/24. Please confirm which dates are correct. If the payment due date is correct, why was this invoice included in the storm event MN25K?

OCC-644. (Storm MN25K – Civil Crews) Refer to Exhibits ACCT-2 (CLP-13A-6) (MN25K) and ACCT-2 (CLP-13A-7) (MN25K). The following pertains to invoices from Charter Oak Utility Constructors Inc.:

a. Several invoices and Excavation Job Forms documents work performed under work order #RPEU0011 (ex. Invoice #39513). Provide additional context and explain how this work order relates to storm MN25K. If this work order number does not relate to the storm event, why was this included within the storm recovery costs?
b. Per review of invoice #39459, the Excavation Job Form was submitted on 2/18/25, however, the work was performed on 1/23/25. Explain how the work performed within this form relates to storm MN25K given the work was performed prior to the start of the storm event.
c. Per review of invoice #39677 and #39990, the work performed was after the storm event. Explain and provide additional support to indicate that the work performed per these invoices related to storm MN25K given the dates documented per the Excavation Job Forms.
d. Per review of invoice #40098, the Excavation Job Form indicated this work was performed under work order #RPEU0011 and was performed on 6/13/25. Provide additional context and explain how this work order relates to storm MN25K.
e. Per review of invoice #40260, the Excavation Job Form has handwritten notes indicating the work performed was related to storm MN25K. Provide additional context and explain how the Eversource approver verified that the work

performed related to storm MN25K. Is there any additional information logged that noted the delay by Cox and Frontier as to why this crew was deployed in June to fix the pole?

OCC-645. (Storm MN25K – Civil Crews) Refer to Exhibit ACCT-2 (CLP-13A-8) (MN25K). The following pertains to invoices from HI Stone & Son, Inc. Per review of these invoices, there is no submission date, work date, work completion date, signature by the contractor, or signature by the Eversource approver. Explain how the Company verified the invoices and work performed by these crews without reviewing the work or having a reference date. If additional support or information is to be considered regarding this work, please provide.

OCC-646. (Storm MN25K - Civil Crews) Refer to Exhibit ACCT-2 (CLP-13A-8) (MN25K). The following pertains to invoices from Henkels & McCoy Inc.

a. Per review of invoice #402951, the scope of work section of the Excavation Job Form notes '2/14/25 callout for hand digging crew to expose secondary fault 2/15/25 backfill and clean up site after completed splice' indicating that the work performed per this form was on 2/14/25 and 2/15/25 prior to the start of the storm. Why was the work documented on this form considered as part of storm MN25K if the work was performed on 2/14/25 and 2/15/25?
b. Per review of invoice #414259, the scope of work section of the Excavation Job Form notes '5/6/25 loam and hydroseed restoration from callout to expose secondary fault on 2/24'. Explain how this work is related to MN25K and if not, why was this considered part of storm MN25K?

OCC-647. (Storm MN25K - Civil Crews) Refer to Exhibit ACCT-2 (CLP-13A-9) (MN25K). The following pertains to invoices from KTI Utility Construction & Maintenance LLC. Provide additional evidence indicating approval of the work by an Eversource representative to confirm that the work was actually performed on these dates by the crews or evidence indicating deployment of these crews. How was the Company comfortable with the work performed per these invoices? Did the Company keep track of the deployment of these crews and their assignments throughout the storm? If so, would you provide that evidence?

OCC-648. (Storm MN25K - Civil Crews) Refer to Exhibits ACCT-2 (CLP-13A-12) (MN25K) and ACCT-2 (CLP-13A-14) (MN25K). The following pertains to invoices from McAllen Construction Inc.

a. Per review of invoice #222025, the amount related to work order #MN25K011 was $1456.08, however, $2,548 was recorded per Exhibit ACCT-2 (CLP-13) (MN25K) Confidential). Please help to reconcile the balance between the two

amounts and if additional support should be considered related to this invoice, provide that support.

b. Per review of invoices #212025 and #282025, there is no work order number that relates to storm MN25K. Explain how these invoices relate to the storm event MN25K and if additional support should be considered related to these invoices, provide that support.

OCC-649. (Storm MN25K - Civil Crews) Refer to Exhibit ACCT-2 (CLP-13A-1) (MN25K). The following pertains to invoices from AJ Penna & Son:

a. Per review of invoice #23637, a portion of the invoice was for work performed on 2/11/25 prior to the start of the storm event. How does the Company consider this work to be a part of the storm MN25K?

b. For invoice #23637, provide the excavation job form for the dates work was performed. If no excavation job form, provide additional evidence indicating the Company requested a deployment of these civil crews on the dates work was performed. Who was responsible for the deployment of these crews for snow plowing and how was the work tracked by the Company?

c. Per review of invoice #23687, a request was made for the work performed on the excavation job form, however, the work was not approved by an Eversource approver. How did the Company gain comfort over the work performed by this civil crew?

OCC-650. (Storm MN25K – Line Crew) The following pertains to the responses provided as part of OCC-409 and the respective invoice #IN0001536-R3 for Atlantic Power Constructors LLC.

a. Considering the response provided in subpart (c) of OCC-409 and invoice #IN0001536-R3 and that the crew's final job for the day ended at 5:00 PM, explain the time spent traveling back to the hotel for the day and the time taken to have the evening meal. Did the Company record this information given the crew was released earlier than the end of the workday? How did the Company ensure the time charged related to this timesheet and invoice was appropriately considered work time and not standby time? Please explain how the crew had continued use for the equipment once it arrived at the hotel location and how those hours spent at the hotel before the end of the workday should not be considered standby time. If the definition of work time is included within the contract provided in OCC-44, provide reference.

b. Considering the response provided in subpart (e) of OCC-409, is breakfast, communication and coordination with Company Dispatcher, safety briefings, and stocking of trucks before the first assignment considered work time or standby time? If the definition of this work is documented within the vendor

contract provided in OCC-044, provide reference. If these activities are held at the hotel or AWC, please explain how the equipment had yet been utilized for the day and why the time spent on these activities should not be considered standby time.

OCC-651. (Storm MN25K – Line Crew) The following pertains to the responses provided as part of OCC-411 and the respective invoice #250012 for Conexus Energy Group LLC. Considering the response provided in subpart (a) of OCC-411, if the workday started at 12:00 PM and the crew did not receive their first job until 2:00 PM, wouldn't this time be considered standby time? Explain how the 2 hours before deployment to the first job should be considered work time. If the definition of this time is documented within the vendor contract provided in OCC-044, provide reference.

OCC-652. (Storm MN25K – Line Crew) The following pertains to the responses provided as part of OCC-412 and the respective invoice #250011 v1 for Conexus Energy Group LLC.

a. Considering the response provided in subpart (a) of OCC-412, explain how the time allocated to safety briefing, onboarding, and meal is considered travel and not considered standby time and cite to all specific applicable contractual provisions.
b. Considering the response provided in subpart (f) of OCC-412, please cite to applicable contract provisions and explain why the crew's time being retained until the end of their shift without any scheduled work is considered work time instead of standby time. If the definition of this work is documented within the vendor contract provided in OCC-044, provide reference.

OCC-653. (Storm MN25K – Line Crew) The following pertains to the responses provided as part of OCC-413 and the respective invoice #J002315 for Holland Power Services Inc. Considering the response provided in subpart (a) of OCC-413, should the activities described be considered standby time? If the crews are performing these tasks without the need for equipment, please explain why that should not be considered standby time instead of work time. Please explain and cite to the applicable contract provisions regarding whether work time begins when the crew is assigned to the first job of the day.

OCC-654. (Storm MN25K – Line Crew) The following pertains to the responses provided as part of OCC-414 and the respective invoice associated with that interrogatory.

a. Considering the response provided in subpart (a) of OCC-414, provide the data from the OMS system regarding the events the crew worked on (36 events)

compared to the events recorded on their timesheets (26 events) to validate the work performed by these workers and to justify the hours worked on each day.

b. Considering the response provided in subpart (b) of OCC-414, provide the Company records noted to indicate the crew worked during the entire shift interval as noted.

OCC-655. (Storm MN25K – Line Crew) The following pertains to the responses provided as part of OCC-417 and the respective invoice associated with that interrogatory.

a. Considering the response provided to OCC-417, how did the Company decide to acquire additional restoration resources from Chicago instead of locally based resources for a quicker response to assist with the storm? If certain factors were considered and locally based resources were fully allocated, provide evidence to supporting the unavailability of local crews and the necessity to bring in the crew from Chicago.

OCC-656. (Storm MN25K – Equipment Rentals) Refer to Exhibits ACCT-2 (CLP-13A-18) (MN25K). The following pertains to invoices from Sunbelt Rentals Inc:

a. Per review of the invoices, generators were provided per contract. Please provide the contract with Sunbelt Rentals Inc.

b. Per review of several invoices, additional labor charges were incurred at certain locations. Explain what additional information/factors were considered in determining the need for additional labor at certain job sites. If additional documentation was considered to support the labor charges, please provide.

c. Several invoices (ex. Invoice #165329892-0002, p. 57) noted a longer outage date (3-4 days). What factors would have caused the increased outage duration and subsequently the additional labor hours? Was the Company informed that a particular job site was taking longer than expected and, if so, how was this documented? If additional information was considered to support the extended outage duration, please provide.

d. Invoice #165441789-0002 (p. 62) - The outage date period for this invoice was 1/18/2025 to 1/19/2025. Explain why this invoice is related to storm event MN25K if the storm didn't occur until February of 2025.

OCC-657. Referring to OCC-89 Interrogatory Response. Why does an R0.75 IOWA Survivor Curve not exist?

OCC-658. Referring to OCC-89 Interrogatory Response. What is the minimum R number value your depreciation software can plot onto an IOWA Survivor Curve?

OCC-659. Referring to OCC-89 Interrogatory Response. What is the maximum R number value your depreciation software can plot onto an IOWA Survivor Curve?

OCC-660. Referring to OCC-245 Interrogatory Response. Provide a list of dates and geographic locations were "bombogenesis" occurred in CL&P service territory.

OCC-661. Referring to OCC-245 Interrogatory Response. Did a Hurricane impact CL&P's service territory during the test year or the four years prior to the test year?

OCC-662. Referring to OCC-245 Interrogatory Response. What was the last hurricane that had minimum sustained wind speed of 74 mph or higher inside CL&P's service territory?

OCC-663. Referring to OCC-245 Interrogatory Response. Does the Company track tornadoes that impact the Company's assets?

OCC-664. Referring to OCC-262 Interrogatory Response. Why does the Company consider Eversource's Foundation as independent?

OCC-665. Referring to OCC-262 Interrogatory Response. Why is an "independent" foundation on the Company's own website?

OCC-666. Referring to OCC-262 Interrogatory Response. Why did the Company allow an "independent" foundation to have the Company's own name?

OCC-667. Referring to OCC-262 Interrogatory Response. What is the Eversource Foundation's address and is that an Eversource owned or leased property?

OCC-668. Referring to OCC-262 Interrogatory Response. Provide the names of the Eversource Foundation's Board of Directors members and state if any are employees of Eversource.

OCC-669. Referring to OCC-282 Interrogatory Response. How did the Company determine the costs associated with flowers and sympathy donations if the Company's accounting software does not track this?

OCC-670. Referring to OCC-282 Interrogatory Response. Provide invoices, receipts, or any other supporting documentation related to the costs for flowers and collection of sympathy donations.

OCC-671. Rest Time. Refer to the response to OCC-046. Provide the amount of paid rest time included for recovery in base rate payroll in the rate year.

OCC-672. Rest Time. Refer to the response to OCC-049. Provide the amount of paid rest time included for recovery for outside contractors (non-storm work) in the rate year.

OCC-673. Incentive Compensation. Refer to the response to OCC-052 which states that in general, employees subject to a collective bargaining agreement are not eligible for variable compensation.

a. Provide the year when the Company eliminated incentive compensation for union employees.
b. Explain whether discontinuing incentive compensation for union employees has had an impact on their job performance.

OCC-674. Prestaging Costs. Refer to WP C-3-27. Provide the unescalated actual amounts for each of the years 2021-2025.

OCC-675. Grab and Go Costs. Refer to the response to OCC-067. Are costs associated with the Grab and Go Self Service Area included for recovery in the rate year? If so, provide the rate year amount by category.

OCC-676. Customer Advances. Refer to the response to OCC-270. Has the Company ever included customer advances as a reduction to rate base? If so, identify the PURA precedent relied on for no longer including these as a reduction to rate base.

OCC-677. Customer Advances. Refer to the response to OCC-270 Attachment 2. Explain the large increase in customer advances beginning in December 2025 through June 2026 over the prior years balances.

OCC-678. Uncollectibles. Refer to the response to OCC-057.

a. Explain why recoveries decreased in 2025 over prior year levels.
b. Explain whether the Company has changed collection efforts or outside vendors handing collection efforts in any of the years 2021-2025.

OCC-679. Payment Processing Fees. Refer to the response to OCC-058. Provide the amount of payment processing fees included for recovery in the rate year including all supporting calculations and documents (bids, quotes, invoices, contracts).

OCC-680. Temporary Help. Refer to the response to OCC-359 Attachment 1.

a. Explain why the rate year amount should be inflated if the Company is requesting recovery of 41 new positions.
b. Explain why the company applied inflation in deriving the rate year amount since the costs declined each year from 2021-2025.

OCC-681. Refer to the response to OCC-359 explain why the rate year amount should be escalated since the costs declined each year from 2021-2025.

OCC-682. Environmental Remediation Expense. Refer to WP C-3.13. Provide documentation supporting the rate year increases. (bids, quotes, contracts, invoices)

OCC-683. Industry Dues. Refer to the response to OCC-073. Do any of the organizations listed engage in advertising? If so, provide the amounts related to advertising included in the rate year.

OCC-684. Arbor Day Celebration. Refer to the response to OCC-100. Provide the amount of Arbor Day Celebration costs included for recovery in the rate year by category.

OCC-685. Arbor Day Foundation. Refer to the response to OCC-100. Provide the amount paid to the Arbor Day Foundation included for recovery in the rate year.

OCC-686. VMP. Refer to the response to OCC-101(a). Provide the name of the contactor used for the current contract and the prior two contracts.

OCC-687. VMP. Refer to the response to OCC-102 Attachment 1. Provide the amounts by category for each year 2021, 2022, 2023, 2024, 2025 and the rate year.

OCC-688. Credit/Collections. Refer to the response to OCC-109. Provide the amount of Alorica costs incurred for each of the years 2021, 2022, 2023, 2024, 2025 and included for recovery in the rate year.

OCC-689. Fee Free. Refer to the response to OCC-141

a. Provide the calculations used to derive the 9% increase in volume.
b. Provide documentation supporting the 8.5% in card processing fees. (invoice, contract, quotes).

OCC-690. Revenew Audits. Refer to the response to OCC-142.

a. Provide the amounts recovered related to costs in 2024 and 2025 by vendor, broken out by storm and non-storm.

b. State how the recoveries were reflected in the rate year. If they were not reflected explain how ratepayers will receive the benefit of the savings.

OCC-691. Advertising. Refer to the response to OCC-261.

a. Provide all advertising expense included for recovery in the rate year by program/category.
b. Also provide the comparable expenses for each of the years 2021, 2022, 2023, 2024, and 2025.

OCC-692. Capital Projects. Refer to the response to OCC-267 Attachment 1. Provide supporting documentation (bids, quotes, invoices, contracts) for each of the projects listed.

OCC-693. Lobbying/Advertising. Refer to the response to OCC-276 Attachment 1.

a. For each Eversource employee that serves on the committees listed, state whether their work on the committees are done during working hours. If so, provide the total fully loaded salary included in the rate year and the percentage of time spent on the committees.
b. Also identify which committees have lobbying and advertising activities and the percentage of the committees' time spent on those activities.

OCC-694. Incentive Compensation. Refer to the response to OCC-198 Attachment 1. Provide the same reports for 2024 and 2025.

OCC-695. Incentive Compensation. Refer to the response to OCC-292 Attachments 1 and 2.

a. Explain why it is reasonable for ratepayers to subsidize incentive compensation for employees falling in the "improvement needed to be a successful contributor" and the "Did not meet performance expectations" categories.
b. Explain why the number of service company employees falling in the "improvement needed to be a successful contributor" category has increased each year from 2021 through 2025.

OCC-696. Incentive Compensation. Refer to the response to OCC-291. The response refers to the response to OCC-201 for the information, however, OCC-201 does not contain 2025 information nor the total number of employees eligible each year as requested in OCC-291. Provide the 2025 information and the number of employees eligible for incentive compensation in each year 2021, 2022, 2023, 2024 and 2025.

OCC-697. Incentive Compensation. Refer to the response to OCC-201 Attachment 1 pages 2, 3, 7, 7, 13, 15-19, 21 and 23. Explain why 1% of reviews were unrated.

OCC-698. Healthcare. Refer to the response to OCC-380.

a. Provide supporting documentation (quotes, invoices, contracts) and calculations for the medical, dental and vision escalation rates.
b. Provide the working rates for each of the years 2021, 2022, 2023, 2024, 2025 and the rate year.

OCC-699. Insurance. Refer to the response to OCC-376 Attachment 3. Provide the premium percentage increases for each year 2021, 2021, 2022, 2023, 2024 and 2025.Explain why accruals for uncollectible claims are included in insurance Expense.

OCC-700. Credit Monitoring Costs. Refer to the response to OCC-20. Provide the amount of credit monitoring costs included for recovery in the rate year associated with this and other attacks.

OCC-701. Non Catastrophic Storm Costs. Refer to OCCC-383. Provide the historical uninflated amounts.

OCC-702. Legal Expense. Refer to the response to OCC-309. Provide an explanation of the increase in 2025 expense over the prior years shown.

OCC-703. Outside Services. Refer to the response to OCC-315. Provide the rate year amount by vendor. Provide support for rate year increases (quotes, contracts, invoices) as originally requested.

OCC-704. Payroll. Refer to the response to OCC-319 Attachment 1.

a. Update Attachment 1 to include information for 2018, 2019 and 2020.
b. Explain why the Company's O&M expense payroll has not reached $129.285 million authorized in Docket No. 17-10-46 each of the years 2021-2025.

OCC-705. Payroll. Refer to the responses to OCC-322 and OCC-325. Explain why the 6/2026 CLP and EESCO FTEs have declined from 12/31/2025 amounts.

OCC-706. Signing Bonus. Refer to the response to OCC 328. Provide the rate year signing bonus as originally requested.

OCC-707. Shared Service Expense. Refer to the response to OCC-355. Provide the rate year amount as originally requested.

OCC-708. Severance Expense. Refer to the response to OCC-357. Explain what positions the large severance amount in 2025 relates to.

OCC-709. ESC Capital Cost. Refer to the response to OCC- 373.

a. Was the ESC capital funding approved in the prior rate case based on the CL&P or the weighted average ROE?
b. Provide the annual amount approved in the prior rate case for each year 2021, 2022, 2023, 2024 and 2025.

OCC-710. ESC Capital Cost. Refer to Exhibit CLP-REVREQ-3 line 27 and Exhibit CLP-REVREQ-2 line 28. Explain why the Company has forecasted an increase in the rate year when the cost has decline from 2023-2025.

Respectfully submitted,

STATE OF CONNECTICUT OFFICE OF CONSUMER COUNSEL

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at East Haddam, Connecticut this 10th day of September, 2026.

By: /s/ Andrew W. Minikowski
Andrew W. Minikowski, Esq.
Commissioner of the Superior Court