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**
		:	**OCTOBER 8, 2026**

THE OFFICE OF CONSUMER COUNSEL'S TWENTY-EIGHTH 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 **October 22, 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-960 through OCC-970 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("CL&P" or "Company"):

OCC-960. Refer to Docket No. 19-03-01 12/30/2024 Compliance Filing, Attachment A. The filing illustrates that in the revised 2025 Capital Plan plans to decrease the total capital expenditures by $82.9 Million from the Company's original plan's stated expenditures of 557.9M to 475.0M. Provide an unlocked, workable excel spreadsheet that illustrates:

a. The actual expenditure for 2025 by Major Program Category;
b. A comparison by category of the actual to revised 2025 Plan contained in the compliance filing;
c. An explanation for each category's actual to revised budgeted expenditure variance;
d. A breakdown by Major Program category of the original plan, revised plan and the actual 2025 expenditures into Aging Infrastructure and other expenditures.

e. Provide the Aging infrastructure amounts from the Eversource 10-Ks for 2020 – 2025.
f. Provide Aging Infrastructure amounts historical applicable and contained within the current rate case exhibits.
g. Provide an explanation for any differences/delta between the amounts filed in the ES 10-Ks and the company's rate case application.
h. Provide the definition of 'aging infrastructure' on the Eversource 10-K.

OCC-961. How does the Parent Company allocate investment capital into its six subsidiary regulated utilities?

OCC-962. Provide the Parent Company's Annual Reports for years 2018 to 2025.

OCC-963. Provide the Parent Company's Proxy Statements for years 2019 to 2026.

OCC-964. Provide the current CL&P franchise agreement.

OCC-965. Has the Parent Company diverted any revenue from the CL&P ratepayer paid distribution charge, revenue decoupling adjustment, Electric System Improvements (ESI) charge, and/or Competitive Transition Assessment charge funds/revenues and removed those funds/revenues from being invested back into CL&P?

OCC-966. Who or what decision making body controls all or any investments that are deployed into the subsidiary company, CL&P? Please provide a narrative description of approval processes for modification of capital budgets, such as those indicated in Eversource's December 30, 2024 Order No. 2 Supplemental Compliance Filing.

OCC-967. Did the Parent Company's $2.4 billion in unregulated losses contribute to the Parent Company's credit rating downgrade in December 9, 2024 from A- to BBB+?

OCC-968. Is the regulated CL&P subsidiary company protected from a Parent Company bankruptcy if its unregulated business ventures have losses that impact the Parent Company's ability to pay required debt payments?

OCC-969. Provide the Parent Company's dividend coverage and dividend payout ratios quarterly for the past 10 years.

OCC-970. Provide all CL&P Q4 Year Exhibits filed in Docket No. 76-03-07 for each year from 2015 through 2025.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Rory Apollonia

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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 New Britain, Connecticut this 8th day of October, 2026.

By: /s/ Andrew W. Minikowski

Andrew W. Minikowski
Commissioner of the Superior Court