UCONN
UNIVERSITY OF CONNECTICUT

STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

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

PETITION FOR INTERVENOR STATUS OF THE UNIVERSITY OF CONNECTICUT

The University of Connecticut ("UConn" or the "University"), through its authorized representative, respectfully petitions the Public Utilities Regulatory Authority ("PURA" or "Authority") for intervenor status pursuant to Connecticut General Statutes §§ 4-177a and 16-19.

I. INTEREST OF THE UNIVERSITY OF CONNECTICUT

UConn is Connecticut's flagship public research university and one of the State's largest consumers of electric energy. The University operates multiple campuses and health care facilities throughout Connecticut, including major facilities served under Eversource Rate 56 and Rate 58 tariffs.

The University's annual operating expenditure is
materially affected by electric distribution and transmission charges. As a public institution funded through a combination of tuition, grants, auxiliary revenues, and state appropriations, increases in electric delivery costs directly impact educational, research, healthcare, and public service missions.

In addition to being one of Connecticut's largest electric customers, UConn owns and operates substantial on-site energy infrastructure, including combined heat and power facilities, distributed generation resources, and other resiliency investments designed to reduce peak demand, improve reliability, and support Connecticut's energy and climate objectives. The University's experience planning, operating, and investing in these systems provides a unique perspective regarding the practical impacts of electric rate design on large institutional customers and the electric system as a whole.

UConn therefore has a substantial, direct, and unique interest in the outcome of this proceeding.

II. BASIS FOR INTERVENTION

The issues presented in this proceeding will significantly affect UConn's current and future electric costs.

According to Eversource's filing, substantial increases are proposed for large commercial and institutional customer classes, including:

- Rate 56 Distribution Demand Charges;
- Rate 58 Distribution Demand Charges;
- Fixed Customer Charges;
- Associated transmission-related cost allocation methodologies.

The University believes these issues warrant careful review because the proposed rate design raises important questions regarding whether customer investments that reduce system peak demand, enhance grid reliability and resiliency, and potentially defer future utility infrastructure investments are appropriately recognized within the proposed rate structure.

III. ISSUES OF CONCERN

UConn intends to participate on, and reserve all rights regarding, the following issues:

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A. Transmission Rate Design

The University seeks review of whether the current and proposed transmission cost allocation mechanisms appropriately recognize customer contributions toward reducing regional and local peak demand and whether such mechanisms provide appropriate economic incentives for continued investment in technologies that improve overall system performance.

Many large institutional customers have invested significant capital in:

- Combined Heat and Power (CHP) systems;
- Fuel cell installations;
- Demand management programs;
- Distributed energy resources;
- Energy storage technologies;
- Peak shaving and load management strategies.

These investments reduce the demands placed upon the electric system during critical periods, improve overall grid reliability and resiliency, and potentially reduce or defer future infrastructure costs that would otherwise be borne by ratepayers.

UConn will examine whether alternative transmission pricing approaches, including coincident peak transmission methodologies, would more accurately allocate costs and create appropriate incentives for future investments.

B. Grid Modernization and State Energy Policy Alignment

Connecticut has established ambitious goals relating to:

- Decarbonization;
- Electrification;
- Grid resilience;
- Distributed energy resource deployment;
- Greenhouse gas reduction.

Rate structures should support these public policy objectives rather than create barriers to beneficial investments in distributed generation and resiliency infrastructure.

The University intends to evaluate whether the proposed rates create appropriate economic signals consistent with state energy policy.

The University further reserves the right to address additional issues that may arise during the course of this proceeding and to supplement or modify its positions as the evidentiary record develops.

C. Cost Causation and Rate Equity

The University seeks to determine whether the proposed increases for large commercial and institutional customers are supported by accepted principles of cost-causation, cost responsibility, and equitable allocation among customer classes and whether costs are being allocated fairly among customer classes.

D. Economic Impact on Public Institutions

As a public educational institution and significant contributor to Connecticut's economy, research enterprise, and workforce development objectives, UConn believes PURA should consider the impacts of the proposed rate design on public institutions and other large nonprofit entities.

The University is also supported in part through state appropriations and public funding. As such, any increases in electric delivery costs may ultimately affect Connecticut taxpayers and the University's ability to carry out its educational, research, healthcare, and public service missions.

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E. Recognition of Customer-Owned Energy Infrastructure

The University intends to examine whether the proposed rate structures appropriately recognize customer-owned investments in combined heat and power systems, distributed generation, fuel cells, energy storage, and other technologies that reduce demand on the transmission and distribution systems while improving grid reliability, resiliency, and operational efficiency. The University also intends to evaluate whether the proposed rates provide appropriate incentives for future investments that advance Connecticut's long-term energy and climate objectives.

IV. PARTICIPATION

UConn intends to participate in this proceeding to the extent necessary to protect its interests, including but not limited to:

- Reviewing filings and testimony;
- Conducting discovery;
- Responding to discovery requests;
- Sponsoring expert testimony;
- Participating in technical meetings;
- Participating in settlement discussions;
- Filing briefs and exceptions;
- Participating in hearings and oral arguments.

V. REPRESENTATION

The University requests that the following individuals be added to the service list:

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VI. CONCLUSION

For the foregoing reasons, the University of Connecticut respectfully requests that PURA grant intervenor status in this proceeding and afford the University all rights available to intervenors under Connecticut law and PURA practice.

The University's participation will assist the Authority in evaluating the impacts of the proposed rate design on large institutional customers, the treatment of customer investments in distributed energy resources and resiliency infrastructure, and the extent to which the proposed rates appropriately advance principles of cost causation, equitable cost allocation, and Connecticut's broader energy policy objectives.

Respectfully submitted,

THE UNIVERSITY OF CONNECTICUT

By: Stanley Nolan

Stanley L. Nolan
Associate Vice President, Facilities Operations
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Date: July 27, 2026

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