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**
		:	**NOVEMBER 2, 2026**

THE OFFICE OF CONSUMER COUNSEL'S THIRTY-FIRST 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 **November 16, 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-1015 through OCC-1016 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-1015. (STORM) Please refer to the Response to OCC-554. Please clarify:

a. Does every contract with every vendor require that the Company pay the vendor a "four-hour minimum for reporting in support of anticipated restoration activities"? If no, please identify which contracts do not require this.

b. Is the four-hour minimum in addition to travel/mobilization time?

OCC-1016. (NWA) Provide the following information in an unlocked Excel spreadsheet with formulas intact, including the hourly load forecasts and equipment ratings used to calculate the MW, MWh, and duration values. If records are unavailable, identify what is missing, explain why, and provide any retained documents showing the forecasts and analyses used to support the project. Identify all capacity/peak load projects placed in service during 2017–2025 or with expenditures during that period included for recovery in this docket. For each project:

a. Provide the project name, scope, study and authorization dates, in-service date, total cost, and amount included for recovery in this docket.
b. Provide the load forecasts, models, assumptions, and planning criteria relied upon at the time of study and authorization. Include assumptions for EVs, heat pumps, solar, storage, C&I growth, data centers, step loads, and economic development load, as applicable.
c. For each year forecast at the time of study, provide:
    i. Maximum capacity exceedance in MW, and in MVA and amperes where available;
    ii. Energy above the applicable equipment rating in MWh;
    iii. Annual increase in exceedance in MW and MWh;
    iv. Total violating hours and maximum continuous duration of exceedance;
    v. Number of exceedance events and peak days, and whether peak days were consecutive; and
    vi. Applicable normal or contingency equipment rating.
d. Provide actual annual peak loading and available hourly loading data from the year of study through 2026. Compare actual loading with the original forecast and explain material differences, including the effects of load transfers and system changes.
e. State whether NWA screening or evaluation was performed. Provide the screening and evaluation dates, criteria applied, results, and screening analyses and supporting workpapers. If screening or further evaluation was not performed, explain why and provide supporting documentation.
f. For each NWA screening or evaluation, provide the assumptions used at that time, including:
    i. Location of the constraint and potential NWA;
    ii. Required MW and MWh of relief by hour;
    iii. Earliest feasible NWA deployment year, potential deferral period, and final year of the analysis;
    iv. Technologies and resource mix evaluated, including the assumed capacity or percentage of battery storage, solar PV, demand response, energy efficiency, and other resources; and
    v. Resource availability, operating limits, degradation, costs, and implementation timelines.
g. Identify NWA, load transfer, staged construction, and traditional wires alternatives considered. Provide the cost, ability to meet the need, and reason each was selected or rejected. Explain why any listed alternative was not considered.
h. For projects that passed or narrowly failed NWA screening, provide the benefit-cost analysis, sensitivities, workpapers, and comparison with load transfer, staged construction, and the traditional solution. Provide any calculations made at the time

of the present value of deferral for one, three, five, and ten years. State which periods were not evaluated and why.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
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 New Britain, Connecticut this 2nd day of November, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court