Date Filed: September 17, 2026

Witness: Craig Dikeman and Matthew J. Correia
Request from: Office of Education, Outreach, and Enforcement

Question:

(PROCUREMENT-DOCUMENTED EXCEPTION) Refer to Response to EOE-046. Provide a detailed listing of all "Documented Exceptions" to the Procurement Policy and Procurement Manual as referenced on p. 4.

Response:

The definitions and categories of "Documented Exceptions" are set forth in the Procurement Manual provided in the Company's response to EOE-046[i]. The transaction-level listing of Documented Exceptions for purchases exceeding $50,000 will be provided in the Supplemental Response to EOE-047[ii].

Prior Referenced Response:

---

[i] EOE-046 Question:

(PROCUREMENT PROCEDURES) Provide copies of the Company's procurement-related policies, procedures, and guidance including details regarding the Company's competitive bid requirements. Provide all versions from 2018 to present and identify any changes that have occurred. Furthermore, specify the materiality of annual (or total) projected spend that requires a competitive bid analysis, the minimum number of proposals, and the frequency of updates. Additionally, identify the requirements for permitting any single source vendors.

EOE-046 Response:

The Procurement Policy and Procurement Manual collectively set the general requirements for competitive bidding, sole source procurement, documentation and governance and are provided as attachments to this response, as designated below. Copies of these documents, including all versions in effect from 2018 through the present reflect documented revision histories identifying material changes. The Procurement Manual is reviewed at least annually. The Procurement Policy is reviewed periodically and updated as needed to reflect governance, compliance and operational changes. Revisions are formally documented with revision numbers and effective dates.

Summary of Procurement Policy Updates (2018 – Present):

- Rev. 1 (12/21/2015): Eversource rebranding and revisions to both the Guideline and Selection Process sections. Refer to EOE-046, Attachment 1.
    - Note: EOE-046, Attachment 1, includes both revisions 1 and 2.

- Rev. 2 (03/18/2019): Introduced explicit policy requirements governing the selling and disposition of surplus material, including procurement oversight and documentation controls. Refer to EOE-046, Attachment 1.

- Rev. 3 (02/07/2020): Expanded and clarified the Guidelines section to reinforce procurement controls and promote consistency in sourcing and contracting practices. Refer to EOE-046, Attachment 2.

- Rev. 4 (08/22/2024): Updated language in the Supplier Selection and Bidding Sections. Refer to EOE-046, Attachment 3.

- Rev. 5 (05/07/2025): Updated the Guidelines section. Refer to EOE-046, Attachment 4.

- Rev. 6 (08/14/2025): Comprehensive Policy revision to align with IOUs best practices, enhance key controls, and clarify roles/responsibilities. Refer to EOE-046, Attachment 5.

- Rev. 7 (11/12/2025): Updated link to the Procurement Manual.

- Rev. 8 (06/01/2026): Clarified Policy Scope regarding the procurement operating model and updated document references/hyperlinks. Refer to EOE-046, Attachment 6.

The current and requested versions of the Procurement Manual (Attachments 7-21), with the summary of updates below:

- Rev.17 (02/04/2019) – Updated the Procurement Manual to reflect organizational title changes and clarify procurement roles and responsibilities. Additional revisions were made to modernize procurement processes, including implementation of electronic sole source workflows, third-party COI administration, updates to contractor safety requirements to alignment with corporate compliance standards. Refer to EOE-046, Attachment 7.

- Rev.18 (01/01/2020) – Updated the Procurement Manual to incorporate NERC CIP compliance requirements for Bulk Electric Systems (BES) and Cyber Systems procurements. Enhanced IT security documentation requirements. Refer to EOE-046, Attachment 8.

- Rev.19 (03/04/2020) – Updated the Procurement Manual to reflect organizational title changes, including revision of the Procurement Director designation. Added active reference link to the Contractor CIP Compliance Agreement and expanded Diverse Supplier definitions. Refer to EOE-046, Attachment 9.

- Rev.20 (07/08/2021) – Updated to align with executive titles with current organizational structure, enhance and refine Diverse Supplier classifications, modernize sourcing terminology, reorganize non-competitive procurement exceptions, and strengthen Sole Source approval requirements. Refer to EOE-046, Attachment 10.

- Rev.21 (11/16/2021) – Updated the Procurement Manual to correct internal section references and align cross-references within the Supplier Diversity and Disqualification sections. Refer to EOE-046, Attachment 11.

- Rev.23 (05/10/2022) – Updated the Procurement Manual to enhance Sole Source governance controls, including expanded executive approval requirements and additional documentation obligations requiring disclosure of sourcing deviations and supplier personnel with prior Eversource employment. Clarified

competitive bid exception language and updated Compliance section terminology. Refer to EOE-046, Attachment 12.

- Rev.24 (09/27/2023) – Updated the Procurement Manual to align Supplier Diversity and Subcontracting Plan requirements with federal government contracting thresholds, clarifying applicability for agreements unique to Eversource's federal contracts and adjusting documentation requirements accordingly. Refer to EOE-046, Attachment 13.

- Rev.25 (02/9/2024) – Updated the Procurement Manual to strengthen Sole Source requirements and clarify non-competitive procurement exceptions. Refer to EOE-046, Attachment 14.

- Rev.26 (06/13/2024) – Updated the Procurement Manual to enhance Competitive Bid requirements, including pricing review requirements for multi-supplier awards. Refer to EOE-046, Attachment 15.

- Rev.27 (08/14/2024) – Updated the Procurement Manual to strengthen Competitive Bid requirements, clarify non-competitive bid exceptions, refine contract definitions, and remove the Capital Approvals process. Refer to EOE-046, Attachment 16.

- Rev.28 (10/15/2024) – Updated the Procurement Manual to add an Original Equipment Manufacturer (OEM) non-competitive bid exception. Refer to EOE-046 Attachment 17.

- Rev.29 (12/11/2024) – Updated the Procurement Manual to align procurement requirements with applicable state and federal contracting laws and regulations. Refer to EOE-046, Attachment 18.

- Rev.30 (08/15/2025) – Updated the Procurement Manual to comprehensively revise procurement governance, strengthen competitive bidding, negotiation, and approval requirements, clarify procurement roles and buying channels, and incorporate requirements for contracts, cybersecurity, data privacy, and policy compliance. Refer to EOE-046, Attachment 19.

- Rev.31 (01/21/2026) – Updated the Procurement Manual to clarify restrictions on supplier participation in pre-solicitation activities and establish Director of Procurement approval requirements. Refer to EOE-046, Attachment 20.

- Rev.32 (07/09/2026) – Updated the Procurement Manual to strengthen commercial negotiation and communication requirements, clarify procurement responsibilities and sourcing controls, expand Normal Goods and Services categories, and enhance supplier conflict-of-interest provisions. Refer to EOE-046, Attachment 21.

Competitive Bid Requirements:

Materiality for competitive bidding purposes is not based on a percentage of annual projected spend, but rather on an individual transaction-level threshold.

Pursuant to the Procurement Policy and Procurement Manual, all procurement transactions for Normal Goods and Services with an individual value exceeding $50,000 must be supported by one of the following:

1. A Competitive Bid

Note: Framework agreements that were competitively bid may have individual transactions over the $50,000 threshold that do not require additional bidding activities.

2. An Approved Sole Source Justification: Supported by an executed Sole Source Justification form or an approved Sole Source Desktop Requisition (DR) in Maximo.

3. A Documented Exception: Completed using the Procurement Exception Template (for Contracts) or designated exception logging (for Purchase Orders) based on authorized criteria in the Procurement Manual.

Note: The requirement to document the exception was introduced in August of 2025. Supporting documentation must be retained in the applicable General File in accordance with records retention requirements.

Minimum Number of Proposals:

The Procurement Manual requires that competitive bids include multiple suppliers and, where feasible, at least three (3) bidders for transactions exceeding $50,000. However, there is no strict mandate that a minimum number of completed proposals must be received. The requirement to invite at least three bidders applies to the extent practicable based on:

- Market availability
- Technical qualifications
- Prequalification status

Requirements for Permitting Single / Sole Source Vendors:

For transactions exceeding $50,000, sole source procurement is permitted when a review of the marketplace demonstrates that only one viable Supplier is technically and commercially capable of providing the required goods or services.

All Sole Source transactions must be supported by a Sole Source Justification containing:

• A detailed commercial and technical narrative describing why no other viable source can meet requirements.

• An explanation of why competitive bidding cannot be conducted and efforts made to examine vendor qualifications.

• Required management approvals in accordance with the approval hierarchy in effect at the time of the transaction

Sole source justifications must be retained in the electronic ordering system (Maximo) as part of the Desktop Requisition or in the Ariba General File as part of the procurement record.

[ii] EOE-047 Question:

(PROCUREMENT PROCEDURES) In addition, to providing the requested policies, procedures, and guidance in EOE-46, above, please provide the following: a. Each instance from 2018 through the present in which the Company approved an exception to its competitive bidding requirements; b. The approving individual(s); c. The justification for the exception; d. The associated vendor and contract value; and e. Whether the exception was documented in writing and where that documentation is maintained.

EOE-047 Response:

Please refer to EOE-047, Attachment 1 CONFIDENTIAL, providing the details requested for Contracts and Purchase Orders released in 2025. Consistent with the Company's response to EOE-051, the Company is preparing its response to this request relative to the scope of this proceeding.

1. For capitalized costs, the Company has compiled and is providing the requested information for the time period 2018-2025, which is in alignment with the plant additions that are requested for inclusion in rate base.
2. For operating and maintenance expense, the Company has compiled and is providing the requested information for the time period 2023-2025, which is in alignment with the Company's test year (calendar year 2025), plus two additional historical years.
3. For storm-restoration expense associated with the deferred storm costs requested for recovery in this docket, the Company has compiled and is providing the requested information for the time period 2024-2025.

With this response, the Company is providing the requested information, within scope, for calendar year 2025, which is the test year for this proceeding. Details for the set of exceptions approved in 2025 are shown in the spreadsheet attached, EOE-047, Attachment 1 CONFIDENTIAL. The Company plans to supplement this response with information pertaining to transactions prior to 2025, as soon as possible.