CIEC-2

Please refer to Whited Direct Testimony at page 11, lines 3-15, and page 12, line 1 (Table 1) and line 2.

Please provide the following regarding Table 1:

a. All workpapers supporting Table 1 in Excel format with formulas intact, to the extent not otherwise provided in response to CIEC-1.
b. The source note to Table 1 cites "Exhibit CLP-AMI-3, Figure 7." Please identify the specific page and figure of Exhibit CLP-AMI-3 from which each net present value ("NPV") benefit amount in Table 1 was taken.
c. Explain the basis for splitting the $163.80 million VVO benefit into $106.2 million energy-related and $57.6 million demand-related, and provide the supporting calculation.
d. For each benefit category in Table 1, explain specifically why the classification assigned reflects the cause of the cost of AMI meters, as opposed to the type of benefit Ms. Whited believes AMI provides.

Response:

a. See Attachment "Response to CIEC-2 (a) Classification of AMI-related costs.xlsx"
b. All values were taken from "Figure 7 – Annual Nominal Costs and Benefits Over 20 Years" on pages 17-18 of Exhibit CLP-AMI-3. These values are reproduced below:

Figure 7 – Annual Nominal Costs and Benefits Over 20 Years

Total 20-Year Cost and Benefit	Nominal Value ($M)	NPV Value ($M)
Total AMI Cost	**$2,568.7**	**$1,557.3**
Meters	$340.0	$238.3
Undepreciated Meter Balance	$136.7	$66.2
Communications Upgrades	$302.2	$167.4
Meter Data Management System (MDMS)	$174.8	$105.1
Customer Information System (CIS)	$536.8	$354.1
Organizational Readiness	$104.5	$83.4
Contact Center	$141.3	$77.2
Incremental Labor (Included in each Cost category)	$0.0	$0.0
Outage Management System (OMS) Integration	$14.8	$11.6
Customer Experience Portal	$116.0	$66.0
VVO Enablement	$377.3	$212.3
Engineering and Customer Usage Analytics	$84.9	$46.4
Customer Engagement	$22.7	$16.1
Cybersecurity	$89.0	$45.7
Revenue Assurance (Non-Technical Line Loss)	$45.7	$20.4
Green Button Connect	$16.2	$7.6
Data Storage and Processing (Included in IT Systems Cost Categories)	$0.0	$0.0
Load Settlement	$65.8	$39.4
Total AMI Benefit	**$2,713.7**	**$1,205.4**
Meter Reading	$50.8	$21.2
Avoided Meter Capital	$343.9	$160.3
Remote Account Connect/Disconnect	$77.5	$32.2
No Trouble Found Calls Reduction	$13.0	$5.7
System Costs Avoidance	$393.8	$199.5
Volt/VAR Optimization (VVO)	$409.0	$163.8
Carbon Reduction	$441.3	$176.8
Asset Optimization	$169.2	$96.4
Advanced Engineering Analysis	$88.5	$38.7
Avoided Connectivity Survey	$16.8	$6.7
Improved Restoration – Significant Storms	$363.2	$162.4
Improved Restoration – Blue Sky	$5.7	$2.5
Reduced Bad Debt / Write-offs	$188.7	$74.5
Reduced Theft and Non-Technical Line Loss	$39.6	$16.5
Reduced Soft Close Loss	$57.1	$24.3
Time of Use / Time Varying Rates	$55.4	$23.9
Customer Targeting for Incentives	$0.0	$0.0
Improved Reliability (Inc. Advanced Engineering and Imp. Restoration)	$0.0	$0.0
Billing Accuracy and Timeliness	$0.0	$0.0
Net Benefit ($M)	**$145.1**	**-$351.9**
Benefit-Cost Ratio	**1.06**	**0.77**

c. No calculations were performed. This value is taken from the portion of the table shown at the top of Exhibit CLP-AMI-3, page 43 for the 20-year NPV. This portion of the table is reproduced below.

Exhibit CLP-AMI-3
Page 43 of 206

	Business As Usual ($M)			Benefit Targets ($M)		
	Baseline Total System Energy Cost Without VVO	Baseline Total System Demand Cost Without VVO	Total Baseline Costs	Energy Reduction With VVO	Demand Reduction With VVO	Total Savings
Year 20	$1,685.32	$917.14	$2,602.46	$23.00	$12.52	$35.52
20-Year Total	$26,747.67	$14,506.23	$41,253.90	$265.10	$143.93	$409.03
20-Year NPV	$13,392.27	$7,256.70	$20,648.97	$106.20	$57.63	$163.83

d. As stated in the NARUC Manual on page 34, "Cost classification identifies the utility operation-- demand, energy, customer-- for which functionalized dollars are spent." The reason that the Company has proposed to install more costly AMI meters as opposed to less costly traditional meters is to avoid certain types of customer, energy, and demand-related costs. Page 11 of Ms. Whited's testimony states "AMI meter costs should be classified in proportion to the net present value of the benefits the Company has quantified, with each benefit assigned according to what drives the cost it avoids. I recommend that benefits from metering, billing, and customer account functions be classified as customer-related, benefits from voltage optimization and reduced line losses as energy-related, and benefits from peak reduction, avoided VVO line sensors, and improved outage restoration as demand-related." If there were no energy- or demand-related costs on the system, there would be no need to install more advanced meters. Thus, energy- and demand-related costs drive the decision to install AMI.

CIEC-3

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-3

Please refer to Whited Direct Testimony at page 4, lines 11-15; page 11, lines 4-9;

and page 12, line 1 (Table 1).

a. Please confirm that Ms. Whited's proposed 38% customer / 47% demand / 15% energy classification would apply only to AMI meter plant (FERC Account 370). If it would apply to any other AMI-related costs (e.g., the customer information system, meter data management system, communications network or VVO enablement), identify each such cost and the classification proposed for it.
b. Please state whether the benefits in Table 1 are, in Ms. Whited's understanding, attributable to the AMI meters alone or to the Company's AMI program as a whole (including the customer information system, meter data management system, communications network and VVO enablement). If the latter, explain why they are an appropriate basis for classifying the cost of the meters alone.

Response:

a. Confirmed.

b. It is Ms. Whited's understanding that the benefits in Table 1 are enabled by the AMI meters themselves, rather than by the meter data management system, customer information system, communications network, etc. Of course, the benefits of the meters themselves are only realized when the meters are installed in conjunction with the rest of the AMI investments. Nevertheless, it was Ms. Whited's intent to separate out the benefits unlocked by the meters themselves, rather than primarily attributable to other AMI components.

CIEC-4

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-4

Please refer to Whited Direct Testimony at page 11, lines 6-9, and page 12, line 1 (Table 1, rows "VVO" and "Asset Optimization").

a. Please state and explain in detail whether the VVO and Asset Optimization benefits shown in Table 1 would be realized if the Company installed AMI meters but did not make the VVO enablement investment included in its AMI cost estimates.
b. To the extent those benefits depend on the VVO enablement investment, please explain why they are an appropriate basis for classifying the cost of AMI meters.

Response:

a. No. Other investments such as line devices such as voltage regulators, capacitors, and LTC controllers at substations must also be installed to unlock these benefits.

b. The benefits associated with the VVO enablement investment also depend on the installation of AMI meters, as shown in Figure 16 on page 198 of Exhibit CLP-AMI-3. Because the benefits arise from multiple investments (i.e., in the meters themselves as well as other VVO enablement investments), it would be reasonable to only attribute a portion of these benefits to the meters themselves. However, to Ms. Whited's knowledge, the benefits have not been divided across the various investments, so it is unclear what proportion should be attributed to the meters themselves.

   The benefits of Asset Optimization are more clearly attributable to the meters themselves, as AMI enables the Company to avoid the cost associated with line sensors. As explained on page 40 of Exhibit CLP-AMI-3, "Asset Optimization details the benefits of avoided cellular charges and avoided line-sensor capital associated with the AMI supported VVO program."

CIEC-5

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-5

Please refer to Whited Direct Testimony at page 11, lines 8-9, and page 12, line 1 (Table 1, row "Improved Restoration – Significant Storms").

a. Please explain specifically how the cost of storm restoration, or the value of reduced customer outage time during significant storms, varies with class peak demand, and provide any study or analysis supporting the classification of this $162.4 million benefit as demand-related.
b. Please identify any regulatory decision or cost allocation authority that classifies storm restoration costs as demand-related.

Response:

a. Avoided storm restoration expense relates to reduced operation and maintenance (O&M) expense such as repairing or replacing poles, conductors, and line transformers on the distribution system. Such O&M expense is classified on the same basis as the plant it maintains or restores. This plant is primarily classified as demand-related in the Company's cost of service study. Under the basic customer method I recommend, distribution poles, conductors, and line transformers (FERC Accounts 364–368) are classified as 100 percent demand-related. The expense of restoring that plant is therefore demand-related as well.
b. Ms. Whited is not aware of how other jurisdictions classify storm-related costs; however her understanding is that these costs may be allocated using allocators associated with distribution or transmission plant, and that such allocators are typically based on various measures of demand. For example:
    a. In dockets E-7, SUB 1243 and E-2, SUB 1262, the North Carolina Utilities Commission approved Duke's storm recovery cost allocation as follows: the distribution-related costs are allocated based on a composite distribution plant allocator and the transmission-related costs are allocated based on a transmission demand factor, both from the 2019 Rate Cases.
    b. Texas law requires that "system restoration costs shall be functionalized and allocated to customers in the same manner as the corresponding facilities and related expenses are functionalized and allocated in the electric utility's current base rates." 2025 Texas Statutes, Utilities Code, Section 36.403(g).

CIEC-6

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-6

Please refer to Whited Direct Testimony at page 4, lines 13-15, and page 11, lines 4-5 and 12-15.

a. Please explain how a classification proportional to projected benefits reflects the causes of the costs being classified, particularly where the projected benefits of the AMI program are less than its projected costs (see Exhibit CLP-AMI-3 at 17-18, Figure 7).
b. If the Company's benefit estimates are revised in a future proceeding, or actual benefits differ from those projected, would Ms. Whited's proposed classification of AMI meter costs change accordingly? Please explain the answer in detail.

Response:

a. Please see the response to CIEC-2 (d). As noted in that response, the additional cost of AMI is incurred to obtain capabilities beyond billing, such as enablement of time-varying rates, outage detection, and voltage optimization. Classifying costs in proportion to the quantified benefits therefore assigns them according to the functions the investment is designed to serve. This is the same principle that underlies classification generally: costs are classified according to the purpose for which they are incurred. The fact that projected benefits are less than projected costs does not change this conclusion.

b. Yes, if the estimated or actual benefits were to change, it would be appropriate to update the classification of the AMI meters.

CIEC-7

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-7

Please refer to Whited Direct Testimony at page 9, lines 13-18.

a. Please identify each AMI capability referenced at lines 14-16 that Ms. Whited contends is not currently available to customers served under Rate 39 and Rate 57 through their existing metering.
b. Has Ms. Whited reviewed the number, type or cost of the meters currently serving Rate 39 and Rate 57 customers? If so, provide the information reviewed.

Response:

a. Ms. Whited has not conducted a review of the specific metering capabilities for customers on Rates 39 or 57.
b. Ms. Whited has not conducted this review.

CIEC-8

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-8

Please refer to Whited Direct Testimony at page 4, lines 11-15, and page 12, lines 3-4.

a. Please identify the allocation factors Ms. Whited would use to allocate the demand-related and energy-related portions of AMI meter costs to rate classes.
b. Please provide, by rate class (including Rate 39 and Rate 57), the allocation of an illustrative $1 million AMI meter revenue requirement under (i) Ms. Whited's proposed classification and (ii) the weighted meter cost allocator used for Account 370 in the Company's ACOSS (Exhibit CLP-ACOS-2 at 16-20). Provide workpapers for the foregoing in Excel format.
c. If Ms. Whited has not performed such an analysis, please explain why not.

Response:

a. As described in her testimony on pages 20-22, Ms. Whited recommends that the Company develop equipment-level allocators for its next base rate case. However, until such allocators are available, she recommends that AMI demand-related costs should be allocated on the same basis as other demand-related distribution costs. It is Ms. Whited's understanding that most of the distribution system benefits would relate to the primary system, and thus primary demand would likely be the appropriate allocator. However, it could also be reasonable to develop a blended allocator if it can be demonstrated that a portion of benefits would also accrue to the secondary system and line transformers, which have different allocators.
   For energy-related AMI costs, Ms. Whited proposes to use kilowatt-hour sales as the allocator. For customer-related AMI costs, Ms. Whited proposes to use the weighted cost of meters.

b. See attachment "Response to CIEC-8 (b) Allocation of AMI meter costs.xlsx"

c. N/A

CIEC-9

Please refer to Whited Direct Testimony at page 12, line 5, through page 13, line 5.

a. Please confirm that in the 24-10-04 Decision (at 197-198), OCC recommended that AMI costs be classified according to benefits in the customer, demand and energy categories, and the Authority "affirm[ed] the Company's proposed classification of AMI meters as 100% customer-related, which is consistent with cost causation principles."
b. Please explain why Ms. Whited's testimony does not address that determination.
c. Please identify each fact specific to CL&P that Ms. Whited contends warrants a different classification of AMI meter costs than the Authority approved for UI.
d. Other than the Maryland decision cited at page 12, line 6 through page 13, line 5, please identify every regulatory decision of which Ms. Whited is aware that adopted or rejected a benefits-based classification of AMI meter costs, and provide a copy of each.
e. Please identify each proceeding in which Ms. Whited or Synapse Energy Economics, Inc. has recommended a benefits-based classification of AMI or smart meter costs, and state the outcome in each.

Response:

a. Confirmed.
b. The Authority decides each proceeding on the evidence before it. In docket 24-10-04, OCC's recommendation was not based on estimates of quantified benefits, as these were not available at the time because the Authority found UI's benefit-cost analysis was deficient. In this proceeding, CL&P has provided quantifiable estimates of AMI benefits upon which one can develop more precise allocation factors. OCC believes that these values provide the Authority with additional information to support the classification that OCC has proposed.
c. See response to (b).
d. Ms. Whited is aware of two other cases in which a similar approach was adopted.
    a. The Colorado Public Utilities Commission has adopted a benefits-based classification of AMI meter costs. This approach was initially approved in 2017. The current 83 percent customer-related and 17 percent demand-related split will be reexamined in PSCo's upcoming rate case, as per the 2023 rate case order (attached).
    b. In 2023, the Minnesota Public Utilities Commission stated that "the new meters would primarily serve to help reduce demand and energy for the class of customers receiving the new meters. But the purpose of the meters is to benefit the utility's

entire system, and society at large; accordingly, it may well make sense to allocate AMI costs to all utility customers—including wholesale customers." Thus, the commission stated that it would no longer give preference to the traditional method of treating customer costs as customer-related and instead "Minnesota Power will have to analyze how AMI meters are associated with customer costs as well as energy costs and demand costs—or, in the alternative, conduct its class cost-of-service study using the premise that AMI costs are allocated equally to customer, demand, and energy factors." *See:* Minnesota Power's 2021 rate case order in Docket E015/GR-21-335, Feb. 28, 2023, at 61.)

e. Ben Havumaki of Synapse proposed such a classification in Consumers Energy's most recent rate case (U-22070). The outcome of this case has not yet been decided.

CIEC-10

Please refer to Whited Direct Testimony at page 4, lines 7-10, and page 18, lines 8-21.

a. Please confirm that in the 24-10-04 Decision (at 198), in response to OCC's recommendation of the basic customer method, the Authority stated that "it is not clear that the basic customer method is a superior alternative" and found that "[t]he MSS approach is a just and reasonable approach to cost classification."
b. Please confirm that in the 22-08-08 Decision (at 227-228), the Authority found the minimum system methodology "generally acceptable" and accepted its use.
c. Please explain why Ms. Whited's testimony cites the 24-10-04 Decision for the load-carrying capacity adjustment (page 17, lines 11-15) but does not address the Authority's rejection of the basic customer method in that same decision.
d. Please identify any facts, data or analysis specific to CL&P, or developed since the 24-10-04 Decision, that Ms. Whited contends warrant a different result in this proceeding.

Response:

a. Confirmed.
b. Confirmed.
c. While the Authority did not accept the basic customer approach in docket 24-10-04, the Authority also did not provide blanket acceptance of the minimum system approach. Rather, the Authority acknowledged OCC's concerns with the minimum system approach and stated that it accepted the MSS approach "in this proceeding." Further, the Authority stated that the MSS approach was an imperfect proxy for geographic dispersion and, on page 200 of its decision, directed UI to "explore the use of proxies that align more closely with geographic dispersion as a cost driver, rather than defaulting to MSS…" My testimony in this proceeding responds directly to these concerns and recommends the basic customer method be implemented only until a customer density analysis can be performed.
d. Because CL&P has not conducted a customer density analysis, the Authority must choose between two imperfect cost allocation methods in the interim: the minimum system approach and the basic customer method. While the Authority accepted the minimum system approach in docket 24-10-04, it limited its acceptance to that particular proceeding. The adoption of the basic customer method in this proceeding would be reasonable given the magnitude of the Company's proposed rate increase and the affordability concerns that this raises, particularly for lower-income customers, since the basic customer method

would reduce the costs allocated to the residential class (as shown on Table 3 of Ms. Whited's testimony.)

CIEC-11

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-11

Please refer to Whited Direct Testimony at page 15, lines 6-16.

a. Please confirm that the "additional distribution system poles and wires" that a new rural customer "may require" in order "to extend service to the customer's residence" (lines 12-14) would be required even if that customer's demand were negligible, and are therefore not caused by that customer's peak demand.
b. Under the basic customer method Ms. Whited recommends, would the cost of those poles and wires be classified as demand-related and allocated to rate classes based on class NCP demand? If so, explain how that result is consistent with cost causation.
c. Please confirm that the costs of the poles and wires required to connect customers vary with the number and geographic dispersion of customers rather than with their peak demand.

Response:

a. Confirmed.
b. Yes, under the basic customer method, the costs of poles and wires are classified as demand-related and allocated based on class NCP. Please see the response to CIEC-10 (c)-(d). Ms. Whited acknowledges that both the minimum system method and the basic customer method are imperfect proxies for geographic dispersion. For this reason, Ms. Whited recommends that the basic customer method be implemented only until a better allocator is developed.
c. Confirmed.

CIEC-12

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-12

Please refer to Whited Direct Testimony at page 15, line 17, through page 16, line 2.

a. Please confirm that, as described at page 15, lines 19-20, Professor Bonbright argued that the costs of the minimum system "should be excluded from demand-related costs."
b. Please explain how Ms. Whited's recommendation to classify all costs in FERC Accounts 364-368 as demand-related (page 19, lines 8-9) is consistent with that view.
c. Please provide a copy of pages 347-348 of Principles of Public Utility Rates (1961) as relied upon.

Response:

a. Confirmed. Bonbright argues that these costs cannot be classified as either customer-related or demand-related.
b. As noted above, both the minimum system method and the basic customer method are imperfect proxies for geographic dispersion, and neither is consistent with Bonbright's observation that these costs should not be classified as either demand-related or customer-related. However, CL&P has not yet conducted a customer density study, and thus a better allocator is not readily available. For this reason, Ms. Whited recommends that the basic customer method be implemented only until a better allocator is developed.
c. Please see the attachment.

CIEC-13

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-13

Please refer to Whited Direct Testimony at page 4, lines 3-6; page 16, lines 3-11; and page 18, lines 15-21.

a. Please provide a copy of any Ontario Energy Board decision or order (as distinct from the Board Staff Discussion Paper cited in footnote 27) that approved the density-based classification method Ms. Whited describes.
b. Please identify each U.S. state regulatory commission of which Ms. Whited is aware that has adopted a customer density-based classification of distribution plant, and provide a copy of each relevant decision.
c. Please confirm that, under the density-based approach Ms. Whited describes, a portion of distribution plant in each density category would still be classified as customer-related.
d. Please identify the data the Company would need to develop the proposed density-based approach and whether, to Ms. Whited's knowledge, the Company currently maintains those data.

Response:

a. Please refer to the attachment.
b. Ms. Whited is not aware of any US jurisdiction that has approved a customer-density based classification of distribution plant.
c. Confirmed.
d. Please see the attachment for a description of the data and methods used to perform the density study for Hydro One in Ontario, including an overview of the customer, asset, and geographic data used on page 4. Note that the Company could conduct a Connecticut-based density study without strictly adhering to Hydro One's methodology. Ms. Whited does not know whether similar data is currently maintained by the Company.

CIEC-14

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-14

Please refer to Whited Direct Testimony at page 16, line 12, through page 17, line 15, and page 19, lines 1-7.

a. Please identify the specific per-customer load-carrying capacity values, by equipment type (e.g., primary and secondary poles, overhead and underground conductors, line transformers), that Ms. Whited recommends be used for CL&P, and provide all supporting workpapers.
b. Please confirm that in the 24-10-04 Decision (at 197-199), the Authority adopted load-carrying capacity values based on UI's own minimum-sized equipment rather than the generic per-customer values of 0.4 kW and 1.5 kW that OCC presented, and found that omitting classes whose demands can "generally" be met by the minimum system "is too imprecise to be a reasonable approach."
c. Does Ms. Whited agree that any load-carrying capacity adjustment for CL&P should be calculated from the load-carrying capability of the specific minimum-sized facilities in the Company's MDS study? If not, explain why not.
d. Please explain how the proposed adjustment would be applied to classes, such as Rate 39, that take service at primary voltage and are not allocated the costs of secondary facilities.
e. Please provide any quantification Ms. Whited has performed of the effect of her proposed adjustment on class rates of return, including for Rate 39 and Rate 57.

Response:

a. Ms. Whited requested that the Company provide these values in OCC-738 (b), but the Company stated that it has not performed such analysis and calculations. However, the Company provided the capacity of the minimum size equipment in response to OCC-728 (b).
b. Confirmed.
c. Ideally, the load-carrying capacity adjustment for CL&P should be calculated from the load-carrying capability of the specific minimum-sized facilities in the Company's MDS study. Absent this data, it would be reasonable to adopt values from other utilities (such as those adopted in 24-10-04) until CL&P values can be developed.
d. A class would receive a load-carrying credit for a component only if it is allocated the customer-related minimum system cost of that same component.
e. Ms. Whited has not performed such analysis.

CIEC-15

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-15

Please refer to Whited Direct Testimony at page 19, lines 8-13, and page 20, line 1 (Table 3).

a. Please identify the data request response or other document that is the source of Table 3 and provide a copy, including any Excel workpapers.
b. Please provide, by rate class, the change in revenue requirement at equalized rates of return that would result from replacing the MDS method with the basic customer method.

Response:

a. Please refer to the response to OCC-729 (a).
b. Please refer to the response to OCC-729 (a).

CIEC-16

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-16

Please refer to Whited Direct Testimony at page 4, lines 16-22, and page 21, line 11, through page 22, line 10.

a. Please confirm that Ms. Whited proposes that the equipment-level allocation study be filed alongside, and not in place of, the Company's conventional class cost of service study in its next rate case, and that she is not recommending that the Authority adopt the equipment-level method in this proceeding.
b. Please confirm that, under Ms. Whited's proposal, the loads of customers taking service at primary or transmission voltage would be excluded from the allocation of facilities at lower voltage levels that they do not use, consistent with the NARUC Manual at 97.
c. Please confirm that Ms. Whited would preserve the Company's current exclusion of customers served from customer-owned transformers from the allocation of Account 368 line transformer costs (Exhibit CLP-ACOS-1 at 6, lines 8-10).
d. Please confirm that in the 24-10-04 Decision (at 200-201), UI reported that its alternative substation and feeder allocators were "very similar" to its NCP and 1CP allocators, and that the Authority retained NCP allocators, adjusted for load-carrying capacity, for poles, conductors and line transformers.
e. Please provide any estimate Ms. Whited has made of the cost to the Company of retaining, aggregating and analyzing hourly AMI data at the substation, feeder and line transformer level.
f. Please explain how the proposed study would allocate the costs of substations or feeders dedicated to serving a single customer.

Response:

a. Confirmed.
b. Confirmed.
c. Confirmed.
d. Confirmed.
e. Ms. Whited has not developed such an estimate.
f. These would be directly allocated to the customer.

CIEC-17

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-17

Please refer to Whited Direct Testimony at page 5, line 6, and page 39, lines 18-20.

a. Please provide the precise tariff definition of "data center loads" that Ms. Whited proposes for the EDR exclusion.
b. Please state whether the proposed exclusion would include a minimum size threshold and, if so, what that threshold would be.
c. Please state whether the exclusion would apply to a manufacturing facility with significant on-site computing, automation or process control load, and explain how such a facility would be distinguished from a data center.
d. Please state whether the exclusion would apply to incremental load resulting from the electrification of industrial processes, such as process heating.
e. Please explain how the exclusion would apply to a facility that combines data center and non-data center operations.

Response:

a. The exclusion from the EDR should apply to facilities that classified under the North American Industry Classification System (NAICS) code 518210 (Data Processing, Hosting, and Related Services).
b. The minimum size threshold should be temporarily set at 50 MW, before a permanent threshold can be determined in a dedicated proceeding on data center tariffs.
c. See answer to subpart (a) above.
d. No. The exclusion would not apply to incremental load resulting from the electrification of industrial processes such as process heating.
e. See answer to subpart (a) above.

CIEC-18

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-18

Please refer to Whited Direct Testimony at page 38, lines 3-19, and page 39, lines 3-10.

a. Please confirm that the EDR approved for UI in the 22-08-08 Decision (at 252) is "available to all C&I customers, without any cap on participation," subject only to an exception for C&I customers directly participating in local commerce, and does not exclude data center loads.
b. Please identify any generation or transmission cost that Ms. Whited contends would be borne by other customers as a result of a discount applied only to the distribution charges of a data center customer.
c. Please provide any Connecticut-specific evidence that the siting decisions of data center developers are insensitive to the level of distribution rates.

Response:

a. Confirmed.
b. Ms. Whited has not identified any generation or transmission cost that would be borne by other customers as a result of a distribution charge discount.
c. Ms. Whited is not aware of Connecticut-specific evidence that data center siting decisions are insensitive to utility rates. The statement indicates that data center developments tend to prioritize speed over cost reflects national trends. See:
    - "For data center developers, speed-to-power far outweighs other factors like the price of power or access to land." Center for Strategic & International Studies. 2025. The Electricity Supply Bottleneck on U.S. AI Dominance. https://www.csis.org/analysis/electricity-supply-bottleneck-us-ai-dominance
    - "While 24/7 power availability is a central goal for data centers and hyperscalers, the top priority remains speed to market." Ascend Analytics. 2026. Data Centers and Power: Speed, Reliability, and Tradeoffs. https://www.ascendanalytics.com/blog/data-centers-energy-tradeoffs-speed-reliability
    - "Power, not location or cost, will be the primary site selection criteria due to multiyear wait times for a grid connection." JLL. 2026. 2026 Global Data Center Market Outlook. https://www.jll.com/en-us/insights/market-outlook/data-center-outlook

CIEC-19

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-19

Please refer to Whited Direct Testimony at page 40, lines 7-22.

a. Please identify each transmission or supply cost that Ms. Whited contends incremental EDR load would impose on other customers and that would not be recovered from the EDR customer through its undiscounted transmission charges and its supply arrangements.
b. Please confirm that new load whose revenue exceeds its marginal cost to serve places downward pressure on rates for other customers regardless of whether that load is concentrated in off-peak hours.
c. Please provide any quantification Ms. Whited has performed of the transmission or supply cost impacts referenced at lines 10-16.

Response:

a. There are two ways that increases in CL&P's peak demand can increase costs to all customers. First, higher peak demand can lead to an increase in generation capacity requirements and higher energy prices, resulting in higher market clearing prices as demand intersects the supply curve higher than before. This would be reflected in higher market clearing prices for all load. Second, increases in peak demand can trigger the need for additional transmission investments. To the extent that the cost of the additional transmission capacity necessary to serve the new load is greater than the system average transmission costs, transmission rates will increase for all customers.
b. Confirmed, as long as the comparison between revenue and marginal cost to serve incorporates all components of the system (generation, transmission, and distribution).
c. Ms. Whited has not performed such analysis.

CIEC-20

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-20

Please refer to Whited Direct Testimony at page 41, lines 15-20, and page 5, lines 7-9.

a. Please state whether the proposed TOU requirement would apply only to the EDR customer's incremental load or to the customer's entire facility, including its pre-existing load.
b. Please state whether the EDR would be unavailable to customers until the proposed industrial TOU rates are filed and approved by the Authority.
c. Please state whether Ms. Whited proposes that the new industrial TOU rates be mandatory, optional or unavailable for Rate 57 and Rate 58 customers that do not participate in the EDR.
d. Please identify each jurisdiction of which Ms. Whited is aware that requires customers to take service under a TOU rate as a condition of eligibility for an economic development rate, and provide the relevant tariff or decision.
e. Please confirm that the EDR approved for UI in the 22-08-08 Decision does not require participants to take service under a TOU rate.
f. Please provide any analysis Ms. Whited has performed of the load profiles, load factors or load flexibility of Rate 57 and Rate 58 customers.

Response:

a. If the incremental load is separately metered, the proposed TOU requirement would apply only to the EDR customer's incremental load. If the incremental load is not separately metered, the proposed TOU requirement would apply to the EDR customer's entire load.
b. The EDR would be unavailable to customers until industrial TOU rates are approved by the Authority.
c. The new industrial TOU rates would be optional for Rate 57 and 58 customers not participating in the EDR.
d. Ms. Whited is not aware of other jurisdictions that require economic development rate customers to take service under a TOU rate. However, many jurisdictions that offer economic development rates also have standard industrial rates that are time-varying. For example, see the attachments for Pacific Gas & Electric's and Public Service Company of Colorado's standard industrial tariffs.
e. Confirmed.
f. Ms. Whited has not performed an analysis on the load profiles, load factors, or load flexibility of Rate 57 and Rate 58 customers.

CIEC-21

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-21

Please refer to Whited Direct Testimony at page 41, lines 3-14.

a. Please provide all studies, data or other support for the statement at lines 9-11 that an eight-hour on-peak period "can make it difficult for customers to manage around."
b. Please identify the on-peak period Ms. Whited would recommend for the industrial TOU rates she proposes, and provide all supporting analysis.
c. Please identify any analysis Ms. Whited has performed of the bill impacts of her proposed industrial TOU rates on Rate 57 and Rate 58 customers.
d. The reference at line 12 to "Section V.29C" appears to be a typographical error. Please identify the section of Whited Direct Testimony intended.

Response:

a. This statement is based on the duration of common commercially-deployed battery storage systems. As stated by Enel, "Most commercially deployed battery energy storage systems have storage durations of two to four hours, used for short-duration applications like ancillary services and shaving demand peaks." https://www.enelnorthamerica.com/insights/blogs/battery-storage-101-everything-you-need-to-know
b. Ms. Whited is not recommending a specific on-peak period for the industrial TOU rates at this time. The selection of the appropriate on-peak period should consider the hours with highest system load, probability of peak, distribution marginal costs, and wholesale energy prices.
c. An analysis on the bill impacts of potential industrial TOU rates on Rate 57 and Rate 58 customers has not been performed.
d. The correct reference should be to Section V.C, which begins on page 29 of the testimony.

CIEC-22

The Office of Consumer Counsel **Witness: Melissa Whited**

Docket No. 26-05-10

Date Submitted: November 11, 2026

CIEC-22

Please refer to Whited Direct Testimony at page 5, lines 10-13; page 43, lines 13-15; and page 44, lines 7-12.

a. Whited Direct Testimony describes the proposed discount cap as "50 percent of the net present value of incremental revenues" (page 5, lines 12-13), as "50 percent of the total incremental distribution revenue from the incremental load" (page 43, lines 13-14, describing the UI EDR) and as "50 percent of the net present value of the incremental distribution revenues, accounting for the cost of connecting the customer and any other electric infrastructure investments made to serve the incremental load" (page 44, lines 10-12). Please reconcile these descriptions and state precisely how the cap would be calculated.
b. Please confirm that Ms. Whited intends the cap and associated hurdle rate analysis to replicate those the Authority approved for UI in the 22-08-08 Decision (at 249-251). If not, identify each difference and explain why it is warranted.
c. Please state whether "the cost of connecting the customer and any other electric infrastructure investments" would include costs that the EDR customer pays directly to the Company through a contribution in aid of construction or otherwise under the Company's new business policies (CL&P Response to OCC-932(a)).
d. Please provide a numerical example illustrating the calculation of the proposed cap.

Response:

a. The cap would be calculated as 50 percent of the net present value of incremental distribution revenues from the EDR customer. The net present value would be equal to the revenues expected from the customer minus the marginal costs to serve that customer, including the payments made by the customer and costs incurred by the Company to connect the customer to the grid under the Company's new business policies.
b. The recommended cap and associated rate hurdle analysis is meant to replicate those approved by the Authority for UI in the 22-08-08 Decision.
c. See response to subpart (a).
d. Assume expected distribution revenues of $10,000,000 from an EDR customer (inclusive of any contribution in aid of construction under Eversource's new business policies), and incremental distribution costs of $6,000,000 to serve that customer (inclusive of the costs to connect the customer to the system).
   The net present value of the incremental distribution revenues is $10,000,000 - $6,000,000 = $4,000,000.
   The cap on the total discount for this customer would be 50% x $4,000,000 = $2,000,000.