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Witness: Christopher Leigh, Sean P. Noonan, Brendan J. O'Brien and Garrett J. Murray
Request from: Connecticut Industrial Energy Consumers

Question:

Specify the total costs for all AI systems that CL&P: (a) incurred in the historic test year; and (b) forecasts to occur in the Rate Year.

Response:

Please refer to the Company's response to ALLCO-170[i]. The Company does not track such costs separately for each Operating Company nor by transmission or distribution.

Prior Referenced Response:

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[i] ALLCO-170 Question:

(AI-related costs, savings, and positions in the revenue requirement.) Identify every cost associated with AI Tools — licenses, subscriptions, implementation, consulting, and the "Data Innovation," "Robotic Process Automation," and Grid Modernization positions referred to in OCC-819, OCC-830, and OCC-333 — included in the Test Year, Test Year Pro Forma, or Rate Year cost of service or in any capital project in Exhibits CLP-ADDITIONS-1 through -6, stating the amount, account, and schedule or workpaper for each; identify every productivity, labor, or outside-services saving the Company attributes to AI Tools or automation in the Rate Year and where it is reflected; and state whether the Company contends that ratepayers should bear the cost of AI Tools whose use the Company simultaneously contends is incompatible with the protection of its confidential information.

ALLCO-170 Response:

There are numerous layers of complexity associated with this question. First, many of the Company's currently approved AI-related tools are not separate licensing models and, instead, are embedded in the licensing for other products by the associated vendor and have no separate existence for cost purposes (i.e. Microsoft O365 now includes Copilot). For example, there are embedded AI tools within some of Eversource's core information-systems platforms that are being evaluated to gauge the enablement and use of new features available through upgrades rather than replacements of systems.

Further, Eversource is in the early stages of enterprise deployment of AI and, to date, the costs of deployment to operating subsidiaries are nominal. For now, the entire initiative is mostly centrally contained. Eventually, the utilization will be institutionalized, and the associated costs will be allocated across the organization in accordance with the Eversource Energy Service Company cost-sharing protocols.

Also, due to the highly volatile and unpredictable future of the evolution of AI, Eversource is still thoroughly evaluating the capabilities and benefits of integrating AI solutions, as many other utilities and industries are doing,

with the primary constraint for Eversource's operating utilities being that worker and customer safety and service reliability are non-negotiables. As a result, any AI applications that Eversource would have under consideration need to align with the "human-in-control" modus operandi, which may result in lower or less widespread AI applicability to the Eversource operating affiliates than other industries. In accordance with processes the Company has long been following, any solution, including AI-enabled solutions, only progress if the solutions are evaluated as constituting functional or operational improvements and/or cost-effective technology alternatives factoring in the balance of costs and benefits. The Company considered these potential efficiencies and constraints when developing the TSP.

Lastly, as stated in OCC-819[i], much of the Robotic Process Automation work is undertaken to avoid additional costs and staffing, while allowing existing staff to focus on more value-added tasks.