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**
		:	**SEPTEMBER 25, 2026**

THE OFFICE OF CONSUMER COUNSEL'S TWENTY-SECOND 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 **October 9, 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-867 through OCC-894 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-867. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-06)(MS24E), p. 25-27. Did this crew perform any work on March 12 or were they on standby at the Cheshire Work Center that day? If they performed work, please indicate where they worked and how the Company knows about and validated that work.

OCC-868. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-06)(MS24E), p. 56. It appears that someone crossed out "MN24F" from the invoice and instead allocated the storm to "MS24E011." Please explain who did this and how they validated that the work should be attributed to MS24E and not MN24F.

OCC-869. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-07)(MS24E), p. 1-16. This vendor included receipts for hotel accommodations, but no travel time was indicated on the timesheets. Was this vendor based in Connecticut? If not, please explain why no travel time was noted.

OCC-870. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-07)(MS24E), p. 61-67.

a. Please explain why the sole charge attributed to this vendor is for vehicle rentals.
b. What vehicles were rented?
c. For what were the vehicles used?

OCC-871. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-07)(MS24E), p. 92-94.

a. Box 12 on the timesheet indicates 15 or 16 hours worked on March 12, but boxes 24 and 25 show the earliest work time starting at 6:45 am and the latest end time at 7 pm. Please explain this discrepancy.
b. Boxes 24 and 25 contain overlapping work times, such that every member of the crew could not have worked each of the times indicated. Please explain how the Company confirmed that every member of the crew worked for 15 or 16 hours that day.

OCC-872. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-07)(MS24E), p. 117-121.

a. Box 12 on the timesheet indicates 9 hours worked on March 12, but boxes 24 and 25 show the earliest work time starting at 8 am and the latest end time at 12:15 pm. Please explain this discrepancy.
b. Boxes 24 and 25 contain overlapping work times, such that every member of the crew could not have worked each of the times indicated. Please explain how the Company confirmed that every member of the crew worked for 9 hours that day.

OCC-873. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-08)(MS24E), p. 21.

a. Please cite to the provision of the vendor's contract in the record that permits the vendor a six hour rest period.
b. The timesheet allocates four hours as "Return to Windsor Locks" after the rest period. Where was the crew before it returned to Windsor Locks?

OCC-874. (Storm MN25K – Invoice) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to Invoice #252417001R (p. 6-22). Per review of the documentation, it was noted that a breakout of the items within the invoice was not included relating to the labor, equipment, meals, and lodging charged and their associated rates per item. Explain how the Eversource reviewer reconciled the work performed by these crews without this breakout and rates. If the vendor provided a breakdown of the invoice, please provide to ensure the appropriate rates were applied based on the contract provided as part of OCC-44.

OCC-875. (Storm MN25K – Travel) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to Invoice #2502415R (p. 23-69). Provide the Mobilization Report for this invoice to indicate the starting location and ending location of travel the crew performed. Explain how the Eversource reviewer confirmed that the travel hours were appropriate for mobilization of the crew without the Mobilization Report.

OCC-876. (Storm MN25K – Timesheet) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to Invoice #25-031 (p. 153-175). Per review of the invoice, the crew worked 10 hours from 12:00 PM to 10:00 PM on 2/17/25. Provide the 'Eversource Contractor Storm Daily Time & Work Report' for these hours to verify the tasks performed by the crew and the events logged.

OCC-877. (Storm MN25K – Approval) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to Invoice #EV2025-0216-R (p. 176-185). Per review of the documentation, it was noted that the approval by the Eversource Representative was on 5/7/25. Given the invoice was provided as of 2/19/25 and the invoice due date was 3/21/2025, explain how the Eversource reviewer was comfortable with the invoice if the work was not yet approved by the Eversource Representative.

OCC-878. (Storm MN25K – Timesheet) Refer to Exhibit ACCT-2 (CLP-13A-19) (MN25K). The following pertains to Vision Utilities Inc invoice #251001RR (p. 223-253). Referring to the timesheets on p. 245-247 and given the number of hours charged (21 hours), explain how the Eversource reviewer validated the hours worked of each crew member and their equipment on these timesheets and how the reviewer ensured that all of the time should be considered work time. Provide additional evidence or documentation to support these individuals worked the entirety of the 21 hours and that the crews did not only work based on their individual timesheets (i.e. on p. 245, the recorded events from 3:00 pm to 11:30 pm accounted for 8.5 hours).

OCC-879. (Storm MN25K – Meals) Refer to Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL, 'Labor by Empl. Title' tab. Provide documentation to support the following Meals. As part of the response, provide relevant calculations, citations, invoices, or other supporting documents.

a. Row 110, Chief/Top Line Mechanic, $150
b. Row 497, Response Specialist – Line, $60
c. Row 1352, Reliability Shift Electrician, $40
d. Row 1898, Line Mechanic, $190
e. Row 3858, Garage Mechanic, $20

OCC-880. (Storm MN25K – P-Cards) Refer to Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL, 'P-Card' tab. Provide documentation to support the following P-Card expenses. As part of the response, provide a description of the purchase, relevant invoices, and other supporting documents demonstrating the necessity and applicability to the MN25K event.

a. Row 103, Jimmy's Store, Meals, $1,104
b. Row 133, Parkway Diner, Meals, $5,500
c. Row 183, Vero Cucina, Meals, $8,670
d. Row 194, The Flying Monkey, Meals, $643
e. Row 198, The Home Depot, General Supplies, $260

OCC-881. (Storm MN25K – Employee Expense Reimbursement) Refer to Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL, 'Empl. Expense&Other' tab. Provide documentation to support the following employee expenses. As part of the response, provide a description of the purchase, relevant invoices, and other supporting documents demonstrating he necessity and applicability to the MN25K event.

a. Row 59, Meals – Employee Reimbursement, $140
b. Row 74, Employee Reimbursement, $638
c. Row 140, Meals – Employee Reimbursement, $200
d. Row 426, Travel, $273
e. Row 424, Meals – Employee Reimbursement, $872

OCC-882. (Storm MN25K – Employee Expense Mileage) Refer to Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL, 'Empl. Expense&Other' tab. Provide documentation to support the following mileage expenses. As part of the response, provide the mileage logs and other supporting documents that were available to the Eversource reviewer at the time of the approval demonstrating the applicability to the MN25K event, as well as the netting of the employee's normal commute.

a. Row 26, $18
b. Row 65, $112
c. Row 179, $221
d. Row 209, $70
e. Row 337, $112
f. Row 391, $253

OCC-883. Vegetation Management. Refer to VMP-1. Provide copies of all supporting documentation relied on by the Company supporting its request to expense rather than capitalize the vegetation management costs, including but not limited to studies, accounting and regulatory guidance.

OCC-884. Vegetation Management. Refer to CLP-VMP-1. Will the vegetation management costs that the Company proposes to expense be used and useful over a period longer than one year? If so, explain why these costs should be expensed in the year incurred including why this treatment is beneficial to ratepayers.

OCC-885. Vegetation Management. Refer to CLP-VMP-1.

a. Provide a list of all categories of vegetation management that will be expensed in the rate year and identify any categories that will be newly expensed.
b. Provide a list of all categories of vegetation management that will be capitalized in the rate year and identify any categories that will be newly capitalized.

OCC-886. Vegetation Management. Refer to RevReq-1, page 114, line 15-17. Has the Company always capitalized the costs it is now requesting to expense? If not, explain when the methodology was previously changed and why.

OCC-887. Vegetation Management. Refer to CLP-VMP-1, page 25.

a. Update the table to contain actual date for the years 2015, 2016, 2017 and forecasted data for 2026, 2027, 2028 and the rate year.

b. Explain why capitalized and expensed vegetation management costs have declined from 2023-2025.

OCC-888. Vegetation management. Refer to CLP-VMP-1, page 25.

a. Provide the budgeted vegetation management costs broken out by expense and capital for each year 2020, 2021, 2022, 2023, 2024, 2025, and forecasted in the rate year.

b. Provide the PURA authorized vegetation management costs broken out by expense and capital for each year 2020, 2021, 2022, 2023, 2024, and 2025.

OCC-889. Vegetation Management. Refer to CLP-VMP-1, page 44. Is Frontier aware of the potential significant increases to the O&M vegetation management to which it will be partially responsible for? If not, when does the Company plan to notify Frontier?

OCC-890. Vegetation Management. Refer to CLP-VMP-1, page 44. Confirm that the Company's vegetation management proposals in this case are contingent upon PURA's approval.

OCC-891. Materials and Supplies. Refer to WP B-4.0 Provide the monthly M&S balances for each of the years 2020, 2021, 2022, 2023, 2024, 2025 and year-to-date 2026.

OCC-892. Materials and Supplies. Refer to Schedule B-4.0 and C-3.21.

a. Explain whether and how these amounts are related.

b. If they are related, explain how including the costs in rate base and expense is not a double recovery.

OCC-893. Inflation. Refer to Schedule C-3.0. For each of the following, provide the amount of inflation included in the rate year, as the inflation amounts were not identified on the corresponding workpapers but it was stated in the revenue requirement testimony that inflation was applied. Also for each, provide the supporting calculations showing how the inflation was derived:

a. Audit Fees
b. Bank Fees and Debt Service Charges
c. Board of Trustees
d. Computer Services
e. Facilities Maintenance
f. Insurance
g. Telecommunications
h. Vehicle Expense

OCC-894. Customer Advances. Refer to the response to see ALLCO-006. Provide the following related to customer advances for each year 2021, 2022, 2023, 2024, 2025:

a. Customer forfeits
b. Credits offset to program costs
c. Customer refunds
   For each subpart, specify the Rate adjustment mechanism the amounts are reflected in, if applicable.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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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 25th day of September, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court