Date Filed: August 21, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM PURA ORDERS) Provide a detailed listing of all storm-related PURA Orders or Guidance, including cites, that supports the incremental storm costs included within the docket. Additionally, provide copies of each of the applicable documents with references to the specific sections that apply.

Response:

This request poses an impossible task in that PURA has addressed numerous aspects of the recovery of costs and the factual and legal parameters relevant thereto, in innumerable decisions spanning decades and the Company relies on that body of precedent as a whole. For purposes of responding to this request, the Company has identified the directives issued in PURA's most recent proceeding (Docket No. 25-12-13) addressing storm-related costs and explains the manner in which the Company has complied, or will comply, with those directives. Please refer to EOE-119, Attachment 1, for a copy of the Docket No. 25-12-13 Decision (or the "2026 Storm Decision").

Docket No. 25-12-13 Directives		
Directive	**Page**	**Compliance**
No later than August 31, 2026, the Company shall submit in Docket No. 26-05-10, an updated storm deferral balance calculating the catastrophic storm reserve accruals starting January 1, 2024, and through at least the start of the Company's proposed rate year as specified in that proceeding, as discussed in Section III.H, Catastrophic Storm Costs Reserve Accruals.	144	The Company plans to file the updated storm deferral balance as directed by August 31, 2026.

Docket No. 25-12-13 Directives		
Directive	**Page**	**Compliance**
No later than August 31, 2026, the Company shall submit documentation clarifying its policies governing the transition from standby status to emergency response work status as discussed in Section III.F.3.e, Standby Billing for Labor. The documentation shall demonstrate that vendor instructions, contractual provisions, and billing practices are applied consistently. The Company may request an extension to this order, but any such request must be accompanied by a status report, including scope of contractual amendments necessary and a proposed timeline for completion of those amendments.	144	The Company plans to file the specified document as directed by August 31, 2026, but should it need an extension, it will request one consistent with the requirements in the Decision.
No later than August 31, 2026, the Company shall, in consultation with the OCC, submit to the Authority for review and approval a revised compensation policy that permits ERP Awards only for ERP Level 3 events or more severe, consistent to the greatest extent possible with its New Hampshire and Massachusetts affiliates, and that excludes a minimum of nine overtime hours before an ERP Award applies, as discussed in Section III.F.2.b, Exempt Employee Emergency Response Plan Payments.	144	The Company plans to file a response by August 31, 2026.
No later than November 20, 2026, the Company shall submit in Docket No. 26-05-10: (a) a report on Eversource's evaluation of options to replace the manual, paper-based contractor timesheet process with an electronic field time-capture system, as described in Section III.C.2, Accounting and Operational Controls; and (b) a plan to evaluate and score the performance of its contractors, FRCs, and arborists against the timesheet requirements, which shall consider implementation of the factors regarding the completeness and timeliness of the contractors', FRCs', and arborists' timesheets, as identified in Section III.C.3.b, Eversource Timesheets.	145	The Company plans to file the report and plan as directed by November 20, 2026.

Docket No. 25-12-13 Directives		
Directive	**Page**	**Compliance**
No later than November 30, 2026, the Company shall submit in Docket No. 26-05-10 an analysis of whether the storm fleet has provided a maximum positive benefit to ratepayers, including an evaluation of whether the storm fleet has provided net benefit to ratepayers for the catastrophic storms under review in that proceeding, as discussed in Section III.F.6.a, Storm Fleet.	145	The Company plans to file the analysis as directed by November 20, 2026.
No later than December 31, 2026, Eversource shall update its Expense Policy to identify meal stipend criteria and to include the following two requirements: (1) supporting documentation for the calculated number of meal stipends; and (2) an affirmation from each employee to confirm that they did not receive a Company-provided meal, as discussed in Section III.F.7.a, Meal Stipends.	145	The Company is currently assessing the steps necessary to comply with this directive.
No later than April 1, 2027, Eversource shall comply with mileage reimbursement requirements as outlined in Section III.F.7.b, Employee Mileage.	145	The Company is currently assessing the steps necessary to comply with this directive.
In the Company's next application to amend its base distribution rates, the Company shall separately account for prestaging and non-prestaging costs, if the Company is requesting recovery of prestaging costs, as discussed in Section III.E.2, Remediation and Materials Costs.	145	The Company is not seeking recovery for any pre-staging costs in Docket No. 26-05-10. The Company keeps separate FERC Accounts for both the catastrophic storm costs and pre-staging event costs.

In addition to the Directives listed above, in the 2026 Storm Decision, PURA directed the Company to propose in Docket No. 26-05-10, a modification to the regulatory framework for deferred storm expenses (2026 Storm Decision, at 37). Consistent with that directive, the Company proposed a modified storm cost-recovery framework in this proceeding. The details of that proposal are set forth in Exhibit CLP-ELP-1 at pages 122-156.

In addition, in this proceeding, as discussed in Exhibit CLP-STORM-1 at page 87, the Company adjusted by 25 percent the cost of small tools included in its requested recovery in this proceeding. This adjustment is reflected in the cost exhibits for each storm event, specifically Exhibits CLP-STORM-ACCT-2 (CLP-1 through CLP-14), "Materials" tab. The Company made

this adjustment based on PURA's precedent in Docket No. 18-11-12 (the "2019 Storm Decision"). In the 2019 Storm Decision, PURA determined that a portion of the costs of tools, supplies, and personal protective equipment ("PPE") should be considered normal operating expenses and, accordingly, found it reasonable to disallow 25 percent of those costs. 2019 Storm Decision, at 13-14. The Company has maintained this approach in this filing. Please refer to EOE-119, Attachment 2, for a copy of the 2019 Storm Decision.

After the Company filed its testimony in this proceeding, PURA issued the 2026 Storm Decision. In that decision, PURA found that 25 percent of materials expenses were non-incremental and therefore not eligible for deferral. 2026 Storm Decision, at 54, 107-109. The 2026 Storm Decision, however, differs from the 2019 Storm Decision in an important respect, which is that, rather than limiting the adjustment to categories such as tools, supplies and PPE, PURA applied the 25 percent adjustment to materials expenses generally.

The Company's proposal in this case is consistent with the fact that the more targeted approach reflected in the 2019 Storm Decision is appropriate. The relevant inquiry is whether the costs were incremental to the storm event, and the various categories of materials do not necessarily have the same characteristics for purposes of that determination, which is the implication of PURA's decision in the 2026 Storm Decision. In particular, tools and durable goods may be reusable after the completion of storm restoration activities and therefore may provide benefits beyond the particular storm event for which recovery is sought. Those costs are fundamentally different from materials that are consumed in the restoration process and have no continuing utility following the storm.

Accordingly, in this proceeding, the Company is requesting that PURA apply the targeted approach from the 2019 Storm Decision and limit the 25 percent adjustment to those categories of materials that may reasonably be considered reusable or otherwise part of the Company's normal operating expenses, including tools and durable goods. Applying the 25 percent adjustment indiscriminately to all materials would overstate the portion of the Company's storm-related costs that is properly characterized as non-incremental and would fail to account for the differing nature and use of the materials included in the Company's request.