STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

August 7, 2026
Docket No. 26-05-10

Re: Docket No. 26-05-10 - Application of CL&P dba Eversource Energy to Amend its Rate Schedules

Enclosed are interrogatories **EOE-119 through EOE-131** directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company"). The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) Office of Education, Outreach, and Enforcement (EOE) in connection with the above referenced docket, and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **4pm on August 21, 2026**. If a response to any of the requested information has already been filed in response to another interrogatory response in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

EOE requests that all interrogatory responses be included in the same document, rather than responses to each interrogatory being filed as individual documents.

Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to Electronic Filing on the Authority's website for more information. **Paper filings will be accepted only if a person is unable to file electronically. The Authority reserves the right to request paper copies of certain filings at a later date.** No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by email using the following directions: confidential material must be emailed directly to **Jeff.Gaudiosi@ct.gov** in an email with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed publicly.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 et. seq. In those

exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion, a proposed protective order and nondisclosure agreement must be appended to the Motion. The Authority will rule on the Motion forthwith, and give further direction as necessary. Contact the Authority's Executive Secretary at (860) 827-1553 with questions regarding making a confidential filing.

The current service list for this docket is available on the Authority's website located at www.dpuc.state.ct.us/DPUCservlist.html.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I 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.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

The following Interrogatories, designated as EOE-119 through EOE-131, are directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company").

EOE-119. (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.

EOE-120. (STORM CUSTOMER CONTRIBUTIONS) Refer to Exhibit-ACCT-1. Provide a reconciliation of the customer contributions reported within Exhibit-ACCT-1 (i.e., WACC Cust Cont tab) to the customer contribution cutoff authorized within Docket No. 25-12-13. To the extent that the contribution dates do not align, explain if there is an update required to the revenue request and provide documentation or calculations supporting the amount.

EOE-121. (STORM SNACKS) Provide an unlocked Excel spreadsheet detailing incremental recovery amounts for any costs related to snacks that are included within the storm recovery amounts for each event. To be clear, snacks are defined to include food and beverages that are not specifically required in support of a meal and would include, but not be limited to, candy, chips, beef jerky, and energy drinks. As part of the response, please cite the specific expenses within the respective Exhibit-ACCT-2 filings.

EOE-122. (STORM EMERGENCY RESPONSE PAY/STIPEND) Provide copies of any applicable emergency response pay policies or procedures applicable to incremental amounts included within the Company's storm balance.

EOE-123. (INTERNAL STAFFING LEVELS) Provide an unlocked Excel spreadsheet detailing the Company's average staffing levels by position (e.g., job title, not individual employees) for each year starting from 2018 through present, along with the overall costs (gross). Additionally, identify the average annual counts and actual amounts that were applicable to Operations and Maintenance (O&M), Capital, Storm, and any other allocated use (including allocations to RAM).

EOE-124. (INTERNAL RESOURCE COSTS) Provide an unlocked Excel spreadsheet listing each employee position (e.g., job title, not individual employees) and separately identify the fully loaded employee cost per year from 2018 through present, along with the calculated hourly equivalent costs. As part of the response, please discuss any assumptions used.

EOE-125. (EXTERNAL STAFFING) Provide an unlocked Excel spreadsheet detailing the Company's 'external' average staffing levels for each year starting from 2018 through present, along with the overall gross costs. To the clear, this request is looking to identify the roles, counts, applicable external vendors, costs, and any other relevant details that could assist in minimizing follow-up interrogatories. This request is applicable to all types of external staffing including, but not limited to, vendors supporting line crew activities, customer service activities, IT development activities, etc.

EOE-126. (EXTERNAL STAFFING-BCA) Identify and discuss all benefit-cost analyses (BCA) performed by the Company since 2017 that assesses the overall costs of hiring internal employees versus external vendors. Additionally, provide complete copies of the analysis and results.

EOE-127. (SAMPLING) Respond to the following:

a. Identify and discuss any sampling methodologies followed by Eversource in support of the execution or review of the Company's internal control environment. As part of the response, identify how the Company extrapolates the results of discrepancies identified.

b. Identify and provide complete copies of any authoritative guidance used by the Company or its consultants that defines requirements for sampling in support of internal controls, independent validations, or assurance engagements. To be clear, this request is looking for any guidance leveraged by the Company, including guidance prescribed by the American Institute of Certified Public Accountants, if applicable.

EOE-128. (VEGETATION CREW HOURS) Confirm whether each tree crew vendor's contractual "normal working hours" remain 7 AM to 4:30 PM (i.e., 0700 to 1630) for each weekday, or a maximum of 9 hours. As part of the response, identify each tree crew vendor and cite the contract provisions that detail these hours. If the contracts do not detail the normal working hours, please provide email or other communications supporting the normal working hours that would bill at standard time (ST) rates.

EOE-129. (VEGETATION CREW BILLING) Explain the contractual obligations for the correct treatment of billing hours during meal breaks for each external tree crew vendor for both non-storm and storm events (i.e., including both working time and standby time). As part of the response, list each vegetation vendor and cite the contract provisions that detail the correct billing practices. If the contracts do not explicitly detail the permitted billable treatment of labor hours for meals, please provide email or other communications supporting the billable treatments.

EOE-130. (VENDOR TRAVEL) Explain the Company's travel review process for external vendors to include any assumptions for determining whether mobilization/demobilization travel time would be considered reasonable (i.e.

in relation to Google/MapQuest estimates), how estimates would be increased by escalation factors, whether the review process differs for different vendors or types of vendors, and whether the Company has performed a study supporting that policy. Additionally, identify if the Company has changed its position outlined within its supplemental response to OCC-41 from Docket No. 25-12-13.

EOE-131. (VEGETATION INVOICES) Explain why vegetation invoice costs do not agree to the requested recovery amounts. As part of the response, please provide an example of the relevant calculations and system screenshots supporting the reported differences.