Date Filed: October 06, 2026

Witness: Counsel
Request from: ALLCO

Question:

Define the cost element "Overhead Linework" as it appears in the Company's interconnection final accountings, including the Fisk final accounting's "Overhead Linework" charge of $232,474.22 within a construction subtotal of $962,547.77: (a) state what categories of cost the element comprises and whether the charged amount reflects costs actually incurred and recorded for the specific project or an allocated or percentage-derived amount, and state the percentage or allocation method if any; (b) identify each person who calculated or approved the $232,474.22 figure; (c) reconcile that figure with the November 20, 2020 statement that actual overhead on the related account was approximately $100,500; (d) produce the construction work-order records that 18 C.F.R. Part 101, Electric Plant Instruction 4(C), requires the Company to maintain showing the nature and amount of each overhead charged to the work orders underlying that figure; and (e) state whether "Overhead Linework" or any equivalent element appears in final accountings issued to other interconnecting customers, and its aggregate amount by year, 2017 through 2025.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.