Date Filed: September 04, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

With respect to the injuries and damages expense, judgments and settlements, and outside legal expense that are the subject of OCC-303, OCC-308, and OCC-309, identify the portion of each that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers (including disputes with Allco or its affiliates), stating the amount, FERC account, and matter; and state whether the Company proposes to recover through rates any judgment, settlement, refund, or interest obligation arising from such disputes.

Response:

With respect to the Company's response to OCC-303[i], CL&P does not track injuries and damages expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's response to OCC-308[ii], there are no judgments and/or settlements resulting from lawsuits brought by distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's responses to OCC-309[iii], CL&P does not track legal expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

Prior Referenced Responses:

[i] OCC-303 Question:

Injuries and Damages.

a. Provide the injuries and damages expense (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025, and included in the rate year. Provide calculations showing how the rate year expense was derived.

b. Provide the injuries and damages reserve balances (direct and allocated), including debits and credits to the reserve, for each of the years 2021 through 2025.

OCC-303 Response:

a. Please refer to the table below for the injuries and damage expense for years 2021 through 2025.

Year	**2021**	**2022**	**2023**	**2024**	**2025**
Workers' Compensation	$775,433	$811,947	$864,244	$908,661	$929,097
Public Liability	$2,407,758	$2,933,449	$4,007,554	$3,753,055	$2,925,703

Please refer to OCC-303, Attachment 1, for the calculation of the Rate Year expense for Workers' Compensation.

The Company calculated the Rate Year level of expense for Public Liability using the most recent actuarial report and monthly accrual expense. This accrual was $318,932 direct and $187 allocated per month.

b. Please refer to OCC-303, Attachment 2, for the injuries and reserves balance, including debits and credits to the reserve, for each of the years 2021 through 2025.

[ii] OCC-308 Question:

Judgments/Settlements (Direct and Allocated).

a. Please provide, in list form, the details of all judgments and/or settlements resulting from suits brought which involved the Company or affiliates as a defendant, which resulted in the Company or affiliates, during the test year, paying or agreeing to pay or being ordered to pay an amount in excess of $10,000, including but not limited to the case name, a brief description of the case, the date filed, the date of settlement or the date of judgment and the amount the Company or affiliates was ordered or agreed to pay. Provide this information even if appeals are pending and note every instance of an appeal.

b. Provide the total amount of judgments/settlements expense (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the rate year.

OCC-308 Response:

a. Please refer to OCC-308, Attachment 1 CONFIDENTIAL, for a list of all judgements and/or settlements resulting from suits brought in federal or state court, which resulted in the Company either paying or agreeing to pay an amount in excess of $10,000 during the years 2021, 2022, 2023, 2024, and 2025.

b. Settlements and judgments that are property damage or bodily injury claims are funded out of the Company's public liability reserve up to $1 million. Property damage and bodily injury settlements and judgements over $1 million are covered by the Company's excess liability insurance. The Company has included $3.829 million in its Rate Year to accrue into the public liability reserve which is recovered from customers through base distribution rates. The table below summarizes the public liability expense for each year 2021 through 2025 and the legal settlement payments that are not covered by the Public Liability Reserve and excess liability insurance.

[iii] OCC-309 Question:

Legal Expense. Please itemize the amount of outside legal expense (direct and allocated) (excluding rate case expense, by vendor, for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the rate year.

OCC-309 Response:

Please refer to OCC-309, Attachment 1, which lists the Company's outside legal expenses by vendor for each of the years 2021, 2022, 2023, 2024, 2025 (Test Year). The Company's outside legal expenses for the Rate Year totaled $5.388 million, which were calculated using the GDP-PI escalation factor against the Test Year Pro-Forma, as provided in Exhibit CLP-REVREQ-2 Schedule C-3.20.