Date Filed: September 21, 2026

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

Question:

Follow-up to the Company's response to Q-ALLCO-019 (recovery of DG dispute obligations through rates). The Company's response did not answer the final portion of Q-ALLCO-019. State whether the Company proposes, in this proceeding, to recover through rates — whether in base rates, through any rate adjustment mechanism, or through any deferral or regulatory asset — any judgment, settlement payment, refund, or interest obligation arising from any dispute with a distributed generation or qualifying facility customer, including without limitation any refund or interest obligation to Allco or its affiliates arising from overcharges for interconnection-related costs. If so, identify each such amount, the schedule and line item in which it appears, and the witness sponsoring it. If not, state the accounting treatment the Company proposes for any such judgment, settlement, refund, or interest obligation that becomes payable during the rate plan term, including the account to be charged and whether shareholders or ratepayers would bear the cost.

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.

Without waiving said objection, as the Company stated in response to ALLCO-019[i], there are no judgments and/or settlements resulting from lawsuits brought by distributed generation developers, qualifying facilities, or interconnection customers; therefore, the Company is not proposing to recover any such amounts through rates. Please refer to the Company's response to ALLCO-006[ii] for the accounting treatment of interconnection refunds.

Prior Referenced Responses:

[i] ALLCO-019 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.

ALLCO-019 Response:
With respect to the Company's response to OCC-303i, 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-308ii, 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-309iii, 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.

[ii] ALLCO-006 Question:
Separately from the customer deposits and customer advances addressed in OCC-74, OCC-75, and OCC-270, state the total amount of deposits, performance assurance, development period security, operating period security, and bid deposits held by the Company from renewable energy developers, qualifying facilities, and interconnection customers as of the end of the Test Year; identify where such amounts are recorded on the Company's books; state whether such amounts are treated as cost-free capital, an offset to rate base, or otherwise in the proposed revenue requirement; and state the amount of interest accrued and paid on such amounts in the Test Year.

ALLCO-006 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.

Without waiving said objection, the total amount of performance assurance, development period security and operating period security held by the Company was $14,115,950 as of the end of 2025. These deposits are refundable to project owners upon completion of project milestones or, if forfeited, credited as an offset to program costs recovered through fully reconciling rates approved in the Company's annual Rate Adjustment Mechanism. As such, the funds are not available to the Company for other purposes and are not reflected in the proposed revenue requirement. Lastly, interest only accrues on a deposit when required under the terms of the agreement and is returned or forfeited with original deposit as described above.