Date Filed: November 16, 2026

Witness: **Juan-Pablo Velez**
Request from: **Connecticut Industrial Energy Consumers**

Question CIEC-16:

Please refer to Velez Direct Testimony at page 5, lines 10-13, and page 30, lines 9-17.

a. Please confirm that the cross-subsidy Mr. Velez identifies is a cross-subsidy within the residential class.

b. Please explain why any revenue reduction resulting from a remedy for a cross-subsidy within the residential class should, or should not, be borne by customers outside the residential class.

Response:

a. Confirmed. The passage CIEC cites says so (5:11–13), as does my response to CIEC-2(b).

b. It should not. My responses to CIEC-2(b) and (c) explain why, and my response to CIEC-2(d) explains how to keep it within the residential class between rate cases.