STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF YANKEE GAS SERVICES COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	**DOCKET NO. 26-05-10**
	:	**October 27, 2026**

FIRST SET OF INTERROGATORIES
FROM THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO THE OFFICE OF CONSUMER COUNSEL

The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") hereby requests responses from the Office of Consumer Counsel ("OCC") to the following interrogatories in the above-captioned proceeding on or before **November 10, 2026**.[1]

Instructions for Interrogatories

The following instructions apply to this set of interrogatories and all subsequent interrogatories issued by the Companies in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request, the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.

2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.

3. These interrogatories shall be deemed continuing in nature so as to require further supplementation if the recipient, their staff or witnesses receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in this proceeding.

[1] Given the limited time period to produce rebuttal testimony, the Company respectfully requests OCC endeavor to provide its responses to these interrogatories seeking workpapers and source materials within seven (7) days, **November 3, 2026**, but acknowledges that in doing so OCC would not waive its right to provide its responses within up to two weeks under PURA's procedural rules for this docket.

4. The terms used interchangeably within these interrogatories relating to "any and all", "documentation", "support", and "justification" mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, memos, reports and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.

5. If the respondent believes that any of these interrogatories are ambiguous or need clarification, please contact counsel for the Companies so that the requests can be clarified prior to the preparation of a written response.

Interrogatories

CLP-OCC-01 Please provide all source documents used to develop the testimony and exhibits DG-2 through DG-16, submitted by OCC Witness David J. Garrett as part of his testimony in this docket regarding The Connecticut Light and Power Company ("CL&P" or the "Company"), dated October 21, 2026 ("OCC Garrett Testimony"). Source documents should include but are not limited to: Value Line reports; original source data from Yahoo, Zacks, and S&P growth rates; and the underlying data and electronic files that support the figures relied on in the OCC Garrett Testimony and exhibits.

CLP-OCC-02 Please provide all cited sources referenced in OCC Garrett Testimony.

CLP-OCC-03 Please provide the workpapers used to create all figures and tables in the OCC Garrett Testimony. Please include original source documents and all electronic files with formulas, figures, and calculations.

CLP-OCC-04 Please provide copies of all cost of capital studies and testimony prepared by Mr. Garrett for electric and/or natural gas utilities over the time-period from 2020 through 2025.

CLP-OCC-05 Please provide, in native electronic format, all workpapers, calculations, analyses, supporting schedules, and other materials prepared or relied upon in the OCC Garrett Testimony to develop, evaluate, or support his depreciation recommendations in this proceeding. For spreadsheets, please provide files with all formulas, cell references, links, and other functional elements intact.

The response should include all calculations and supporting workpapers used to develop Mr. Garrett's remaining life estimates, including any generation arrangement or equivalent calculation showing the calculated remaining life for each vintage or age. Please also provide any supporting data, assumptions, curve selections, and intermediate calculations necessary to reproduce those results.

CLP-OCC-06 Identify each instance known to Mr. Garrett in which a state public utility commission or other utility regulatory authority has approved, adopted, or expressly accepted an O3 Iowa survivor curve for determining depreciation rates for utility property. For each instance, please identify the following:

a. the utility;

b. the regulatory jurisdiction;

c. the docket number or other proceeding identifier;

d. the plant account or property group to which the curve was applied;

e. the average service life associated with the curve; and

f. the order, decision, testimony, exhibit, or other document evidencing the approval, adoption, or express acceptance, including the date and specific page, paragraph, or other relevant citation, if available.

Please provide copies of the identified orders, decisions, or other supporting documents, or provide a publicly accessible electronic link to each document. If the curve was adopted subject to conditions or as part of a settlement, please identify those circumstances.

CLP-OCC-07 For each instance known to Mr. Garrett in which a state public utility commission or other utility regulatory authority has approved, adopted, or expressly accepted an L0 Iowa survivor curve for determining depreciation rates for an electric utility pole account, please identify the following:

a. the utility;

b. the regulatory jurisdiction;

c. the docket number or other proceeding identifier;

d. the specific plant account or property group covering electric utility poles;

e. the average service life associated with the curve; and

f. the order, decision, testimony, exhibit, or other document evidencing the approval, adoption, or express acceptance, including the date and specific page, paragraph, or other relevant citation, if available.

Please provide copies of the identified orders, decisions, or other supporting documents, or provide a publicly accessible electronic link to each

document. If the curve was approved or adopted subject to conditions or as part of a settlement, please identify those circumstances.

CLP-OCC-08 For each instance known to Mr. Garrett in which a state public utility commission or other utility regulatory authority has approved, adopted, or expressly accepted an L0 Iowa survivor curve for determining depreciation rates for an electric utility underground conductors and devices account, please identify the following:

a. the utility;

b. the regulatory jurisdiction;

c. the docket number or other proceeding identifier;

d. the specific plant account or property group covering underground conductors and devices;

e. the average service life associated with the curve; and

f. the order, decision, testimony, exhibit, or other document evidencing the approval, adoption, or express acceptance, including the date and specific page, paragraph, or other relevant citation, if available.

Please provide copies of the identified orders, decisions, or other supporting documents, or provide a publicly accessible electronic link to each document. If the curve was approved or adopted subject to conditions or as part of a settlement, please identify those circumstances.

CLP-OCC-09 Please refer to the Direct Testimony of Mr. Balakumar at pages 11 and 101, where he recommends that PURA "[d]isallow recovery of, at minimum, the portion of the $62.0 million requested for storms MS24A, MS24B, MS24C, MS24D, MS24H, and MS24K that exceeds established spending benchmarks." With respect to each "spending benchmark" identified, referenced, discussed, considered, relied upon, or otherwise used by Mr. Balakumar, or that otherwise forms the basis for or supports his recommendation, please:

a. Define the term "established benchmark" as used in Mr. Balakumar's testimony, including each criterion that a benchmark must satisfy to qualify as established.
b. State whether the Mr. Balakumar uses the term "established" to mean formally approved, adopted by PURA, recognized through industry practice, supported by published research, or something else.
c. Identify and describe the benchmark, including the specific storm costs, cost categories, or expenditures to which it applies;

d. Identify each document, data source, or other information relied upon to establish the benchmark, including the title, date, author or originating entity, and relevant page, section, or data field, as applicable;
e. Describe in detail the methodology and calculations used to establish the benchmark, including all formulas, assumptions, inputs, and adjustments; and
f. Provide all documents, data, workpapers, spreadsheets, and other materials relied upon or used to develop, calculate, or validate the benchmark.