Date Filed: November 13, 2026

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

Question:

(ALLCO-034(b) ─ supplementation.) The Company's response to ALLCO-034(b) states that Keegan Werlin LLP "has not yet invoiced the Company" for redaction and confidentiality-designation services, that the Company "does not separately track" the time of internal resources on that work, and that the response "will be supplemented." (a) State the date of Keegan Werlin LLP's engagement for that work, the hourly rates or other basis of compensation, any budget or estimate, the hours recorded through September 30, 2026, and the amount invoiced or accrued through that date; and produce the engagement letter or other document defining the scope of the engagement. (b) State TCDI's total billings through September 30, 2026, and the Company's current estimate of total TCDI cost for this proceeding. For each month since the Application was filed, state, by title, the hours and loaded cost of the Company's and ESC's internal legal counsel, project-management, regulatory, and other personnel devoted to confidentiality-designation and redaction work, using time records where they exist and, where they do not, a documented estimate stating its basis. (d) Identify the account(s) to which each amount in (a) through (c) has been charged and whether any amount has been deferred as a regulatory asset. (e) State the date by which the Company will serve the supplementation it has promised.

Supplemental Response:

Please refer to ALLCO-124-SP01, Attachment 1 REDACTED, which contains redactions as directed in PURA's Motion No. 95 Ruling.

Original Response:

a. Please refer to the Company's response to ALLCO-027[i] and the attachments thereto.

b. – c. Please refer to the Company's response to ALLCO-034[ii] subpart b. The Company provided TCDI invoices through the end of August 2026 and TCDI's estimate of costs for additional redaction work in September of 2026. The Company provides as ALLCO-127, CONFIDENTIAL Attachment 1, TCDI's September 2026 invoice. Also, as stated in ALLCO-034 subpart b, "The Company does not separately track time for redaction and confidentiality designation work performed by internal resources." Please also refer to the Company's response to ALLCO-079[iii].

d. Please refer to the Company's response to ALLCO-076[iv].

e. Supplementation of invoices is dependent upon the Company's receipt of invoices from third parties. The Company cannot speculate as to when it will receive this documentation.

Prior Referenced Responses:

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[i] ALLCO-027 Question:

With respect to the approximately $3.1 million of rate case expense included in the proposed revenue requirement (Exhibit CLP-REVREQ-1; response to REVREQ-9), including the approximately $1.875 million estimate for Keegan Werlin LLP: (a) produce the engagement letter(s), fee agreement(s), rate schedules, and any budget or estimate for each outside firm and consultant included in rate case expense; (b) state the amounts billed and paid to date, by firm; (c) state whether the Company considered performing any of the rate case legal work with its internal legal function or solicited proposals from any other firm, and if not, why not; and (d) explain how the Company determined that the estimated amounts are reasonable for recovery from ratepayers.

ALLCO-027 Response:

a. Refer to the following attachments for the engagement letter for rate case services:

- ALLCO-027, Attachment 1 CONFIDENTIAL, for Keegan Werlin LLP bid proposal.
- ALLCO-027, Attachment 2 CONFIDENTIAL, for Keegan Werlin LLP engagement letter notifying KW its bid was accepted.
- ALLCO-027, Attachment 3, for a listing of contracts with outside firms and consultants included in rate case expense.
- ALLCO-027, Attachment 4 CONFIDENTIAL, for contracts listed in Attachment 3.
- ALLCO-027, Attachment 5 CONFIDENTIAL, for contracts listed in Attachment 3.

b. Refer to ALLCO-027, Attachment 9, for the summary billed by vendor through June 2026.

- See also ALLCO-27, Attachment 10 CONFIDENTIAL, for Keegan Werlin invoices through May 31, 2026.

c. The Company considered the capabilities of its internal staff to perform the rate case legal work when making decisions whether to seek outside service providers. The decision was made to utilize internal staff for a portion of rate case work and to solicit proposals for an outside vendor to assist with the other portion of rate case legal work.[1] The Company does not maintain sufficient internal legal resources to fulfill the substantial work requirements of the ongoing typical workload of both CL&P and Yankee Gas Services Company d/b/a Eversource Energy, while also tending to high demand, unusual proceedings like a base rate because these types of proceedings occur at irregular intervals.

Therefore, the Company's legal staff contacted law firms that either had experience with utility rate matters or have attorneys on staff with rate making or rate case experience. The Company issued a request for proposal ("RFP") to three law firms for assistance with legal services for the rate case, presented in ALLCO-27, Attachment 6.

The responses to this RFP are provided in ALLCO-27, Attachment 7 CONFIDENTIAL, and ALLCO-027, Attachment 8 CONFIDENTIAL. See also ALLCO-27, Attachment 1 CONFIDENTIAL.

The Company selected Keegan Werlin because of its specialized expertise and resources in handling base-rate proceedings, its prior experience working with the Company, the large volume of legal work associated with a rate-case proceeding and Keegan Werlin's staffing to handle that work; the existing workload of in-house legal staff; and the firm's competitive pricing.

d. The Company is aware of the requirement to contain costs for outside services providers and has taken steps to ensure costs are negotiated to the lowest levels possible while still receiving the highest quality of service. Initially, when the decision was made to use an outside service provider, the Company competitively bid these services as described above. Once an outside service provider is selected, the Company limits the total contract costs through mechanisms such as blended hourly fees, discounts and not-to-exceed levels.

Additionally, as discussed above, the rate case requires a large volume of legal work from highly experienced and specialized legal staff. All of this work is relevant and necessary to the preparation and presentation of the Company's rate case proceeding.

[ii] ALLCO-034 Question:

The Company's September 1, 2026 "Redacted Bulk Material" filing describes the preparation of public, redacted versions of Exhibit CLP-STORM-ACCT-2(A) as "a manual, labor-intensive process involving a cross-functional team of external vendors and Company personnel." With respect to all redaction and confidentiality-designation work performed in connection with this proceeding (including the storm invoice compilations and all other exhibits and discovery responses): (a) identify each external vendor engaged and each category of Company or ESC personnel involved (by title); (b) state the costs incurred to date and the estimated total cost, separately for vendor fees and for the allocated time of Company/ESC personnel; (c) identify the account(s) to which such costs have been or will be charged, and state whether any portion is included in, or will be sought for recovery through, the Test Year or Rate Year revenue requirement, rate case expense, or any deferral; and (d) if any such recovery is or will be sought, state the Company's legal basis for recovering such costs from ratepayers notwithstanding Conn. Gen. Stat. § 16-243p(b).

ALLCO-034 Response:

(a) The Company has engaged the Technology Concepts and Design Inc. ("TCDI") Military Spouse Managed Review program and Keegan Werlin LLP to assist with redaction and confidentiality-designation work due to the volume of documentation. Additionally, the Company's internal legal counsel and project management staff are performing redaction and confidentiality-designation work.

(b) The Company does not separately track time for redaction and confidentiality designation work performed by internal resources. Keegan Werlin LLP was only recently engaged to perform high-volume redaction and confidentiality-designation services and, accordingly, has not yet invoiced the Company for those services. The Company will supplement this response with the requested information for Keegan Werlin LLP once it becomes available. TCDI has billed the Company a total of $26,990.40 for redaction work through the end of August 2026. The invoices for the TCDI work are provided as Attachment ALLCO-034, Attachment 1 CONFIDENTIAL. TCDI estimates the costs for additional redaction work in September of $5,000 or less. The Company will supplement this response with additional information, as necessary, once it becomes available.

(c) The Company is tracking the costs associated with the redaction and confidentiality designation work and plans to seek recovery for these costs in this proceeding.

(d) The Company has been advised by legal counsel that the confidentiality-designation and redaction work does not fall within any of the enumerated classes or categories of costs that are ineligible for recovery through rates under Conn. Gen. Stat. § 16-243p(b). The Company has been further advised that the costs to perform the confidentiality-designation and redaction work are incurred to comply with legal obligations governing disclosure of public records and confidential information.

[iii] ALLCO-079 Question:

(Follow-up to ALLCO-034.) Supplement the response as the Company committed: produce the Keegan Werlin LLP invoices for redaction and confidentiality-designation services as they are rendered, and state the amounts billed to date; provide the Company's best estimate of the internal Company and ESC personnel time (by title, with hours and loaded cost) devoted to redaction and confidentiality-designation work in this proceeding, notwithstanding that such time is not separately tracked; identify the account(s) to which all such costs have been charged; and state the amount included in, or to be sought through, the Test Year or Rate Year revenue requirement, rate case expense, or any deferral, with the schedule and line.

ALLCO-079 Response:

Please refer to the Company's response to ALLCO-034i wherein the Company stated that it "will supplement this response with the requested information for Keegan Werlin LLP once it becomes available" (emphasis added). The Company's response to this interrogatory was recently submitted on September 16, 2026, and to-date, the Company has not received an invoice from Keegan Werlin for these services. Eversource will supplement ALLCO-034 once this information becomes available. Also as stated in the Company's response to ALLCO-034, Eversource does not separately track time for redaction and confidentiality designation work performed by internal resources.

[iv] ALLCO-076 Question:

(Follow-up to ALLCO-023.) The response omitted 2018 through 2020 entirely and provided no breakdown by vendor category. State, for each calendar year 2018 through 2025 and the Test Year: (a) the Company's total outside counsel fees (direct and allocated), by firm for the ten highest billing firms each year; (b) total other legal-related vendor costs, stated separately for e-discovery and litigation-support vendors, court reporters, expert witnesses and consultants engaged through counsel, and claims administrators; and (c) the amounts of (a) and (b) allocated to the Company, with the FERC accounts used; and reconcile the 2021-2025 amounts to Exhibit CLP-REVREQ-3, identifying page and line.

ALLCO-076 Response:

(a) Please refer to ALLCO-076, Attachment 1, for a list of outside legal expenses by vendor for each years 2021, 2022, 2023, 2024 and 2025 (Test Year). ALLCO-076, Attachment 1, shows the outside legal expenses identified by: (1) legal service category consistent with the categories included in Exhibit CLP-REVREQ-3.20; (2) whether it is a direct or allocated charge; and (3) the applicable FERC account(s). For each year 2018 through 2020, the information is not readily retrievable.

(b) The Company notes ALLCO-023i did not ask for a "breakdown by vendor category" or "for total outside counsel fees (direct and allocated), by firm for the ten highest-billing firms each year." ALLCO-023 asked for the Company's total legal spend "separated into (a) internal/ESC legal function costs, (b) outside counsel

fees, and (c) other legal-related vendors (e.g., e-discovery, court reports, expert witness, claims administrators)."