STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**OCTOBER 5, 2026**

THE OFFICE OF CONSUMER COUNSEL'S TWENTY-FIFTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **October 19, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-911 through OCC-933 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-911. (FRAUDULENT ACCOUNTS) Please refer to the Response to EOE-71. If someone opens an account via Eversource.com and enters a minor's legitimate name, address, and Social Security Number, will the system prevent the establishment of the account for someone under the age of 18?

OCC-912. (COMPLAINT DEFINITION) Please refer to the Response to EOE-95. Is the Company stating that a "complaint" must come from a government entity or government individual and that a complaint cannot come directly from a customer to the Company? If yes, is every customer contact with the Company considered an "inquiry"? If no, please explain and indicate all ways in which the Company may receive a customer complaint.

OCC-913. (ACCOUNT NUMBERS) Does the Company create a new customer account number if the customer moves to a different address?

OCC-914. (ACCOUNT NUMBERS) Has the Company experienced issues where customers who have moved to new addresses are paying for incorrect accounts? If yes, please describe.

OCC-915. (ACCOUNT NUMBERS) If a customer pays into an incorrect account, how will that customer be identified?

OCC-916. (ACCOUNT NUMBERS) If a customer pays into an incorrect account does the customer get a credit on the "correct" account once the error is discovered by the Company?

OCC-917. (ACCOUNT NUMBERS) How does the Company prevent incorrect accounts from being created for customers or other potential errors linked to incorrect account numbers?

OCC-918. (MS24C - Misprint) Referring to Exhibit ACCT-2 (CLP-3A-1) (MS24C) CONFIDENTIAL page 445. Why does this page have purple edits on it and who added those edits?

OCC-919. (MS24C - Misprint) Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C) Confidential page 81. Why does this page have purple edits on it and who added those edits?

OCC-920. (MS24C - Misprint) Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C) Confidential page 172. Why is there writing outside the boxes on the form?

OCC-921. (MS24C - Revisions) Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C) Confidential page 77. Why are there cross outs and other revisions on this page and who made them?

OCC-922. (Capital Projects) Referring to Exhibit CLP-Additions-1, pages 17-23. Did the Capital Project Authorization Procedures change since 2022?

OCC-923. (Capital Projects) Referring to Exhibit CLP-Additions-1, pages 27-29. tThe Company states that the PAF policy is applied when "the full budget and scope" of a project might not be known. Please explain how the Company makes a determination on whether a project requires a PAF or not during the preliminary

stages of a project when the full budget and scope are not yet known. As part of this response, identify if there is a "high-level" or initial project costs developed for this purpose and, if so, explain how this estimate is developed.

OCC-924. (Capital Projects) Referring to Exhibit CLP-Additions-1, page 12. Please define the term "flexibility in the budget"; explain what determines whether a project has budget flexibility or not; and identify the components (i.e. project cost categories) of a project budget which are flexible and which are inflexible.

OCC-925. (Capital Projects) Referring to Exhibit CLP-Additions-1, page 28. The Company states, “Projects less than $500,000 in total cost do not have as many opportunities for cost savings because these are smaller, short-term projects with more predictable budgets. These smaller capital projects are more likely to be routine and utilize equipment and materials previously competitively procured by the Company or ESC. This minimizes the potential for cost savings that could result from further review and analysis.” Please describe the "further review and analysis" the company conducts to determine the potential for cost savings. Provide five examples of projects submitted in this proceeding where cost savings were achieved through this review and analysis step.

OCC-926. (Capital Projects) Referring to Exhibit CLP-Additions-1, page 29. Projects that are "repetitive, numerous, and routine" are "authorized via annual program authorizations, rather than on an individual project basis. " Why is this the case?

OCC-927. (Capital Projects) Referring to Exhibit CLP-Additions-1, page 28. The Company states, “Larger projects with more than $500,000 in total cost will have more prospects for cost savings because they often involve multiple phases over longer periods of time, which affords the Company the opportunity to reevaluate and minimize expenses in the event of a change in scope or budget.” It is understood that the phasing of a project breaks up a project scope into multiple components or sub projects. The overall scope of a project -- whether it is phrased or not -- does not change. It is not clear here from the panels' testimony how the phasing of a project results in greater "prospects" for cost savings. One possible interpretation of what the panel is saying here is that larger projects have "flexible budgets" because the phasing allows for scope and budget for the project to be shifted across different budgeting periods. In other words, phasing does not necessarily lower the project costs but the flexibility offered by phasing a project is that it allows for the company to only have to account for part of a project when developing the annual capital budgets.

a. Confirm whether this is a correct interpretation.
b. If the Company believes it is not a correct interpretation explain why not and elaborate on how exactly phasing allows for the potential for cost savings.

OCC-928. (ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 31, which states that the proposed EDR "produces system-wide benefits by improving utilization, enhancing fixed cost recover, and placing downward pressure on rates."

a. Please explain whether and how the rate schedules applicable to EDR customers (Rate 57 and Rate 58) provide incentives for customers to shift load away from system or local peak hours. If not, why not?
b. Please provide the capacity headroom on the Company's system and identify the date and hour of the system peak for the last 3 years.
c. Please provide the capacity headroom for each of the Company's substation, along with the date and hour of peak at each substation for the last 3 years.

OCC-929. (ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26. Please explain the standards the Company will use to determine that a customer's project provides sufficient economic value, including job creation and capital investment, to qualify for the EDR.

OCC-930. (ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26. Please explain the standards the Company would use to determine that a customer's project sufficiently supports regulatory objectives to qualify for the EDR. Please also identify the relevant "regulatory objectives."

OCC-931. (ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26-27. Please explain what information a customer will be required to submit to demonstrate that "new load or expanded operations would not occur, or would be materially altered, absent the availability of the EDR." Will applicants be required to provide pricing offers from other utilities/jurisdictions? If not, why not?

OCC-932. (ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 29.

a. Please explain what equipment is included in the "interconnection, system upgrade, or make-ready costs" for which EDR customers would be responsible (e.g., substations, transformers, conductors, etc.).
b. If upgrades to shared infrastructure, such as substations, are required, explain how the costs of the upgrades are recovered.

OCC-933. (ECONOMIC DEVELOPMENT RATE) Refer to the Company's response to OCC-458.

a. Explain the factors that will be considered in negotiations with each EDR customer (e.g., potential system benefits, economic development benefits) and the relative weight of each factor for determining the customer's discount level.
b. Did the Company consider providing the same discount level for all EDR customers? If so, why did the Company rule out this option? If not, why not?

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 5th day of October, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court