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**
		:	**AUGUST 25, 2026**

THE OFFICE OF CONSUMER COUNSEL'S TENTH 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 **September 8, 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-449 through OCC-486 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-449. (CUSTOMER SERVICE) Please refer to the Response to OCC-109, which states that both internal CSRs and Alorica handles customer inquiries regarding "high bill concerns, establishing new service, disconnecting existing service, payment processing…" For all topics for which internal CSRs or Alorica may assist a customer, please explain how the calls are routed to either the internal CSR or to Alorica (i.e., what determines if an Eversource employee or Alorica handles the call?).

OCC-450. (CUSTOMER SERVICE QA) Please refer to the Response to OCC-110.

a. The Response states, "Eversource's internal vendor management team also separately reviews more than one hundred additional, randomly selected Connecticut credit and collections calls handled by the Company's third-party

vendor partner…" Please indicate the time frame over which Eversource reviews those 100 calls (i.e., annually? Monthly? Etc…)

b. OCC-110 requested all written policies and procedures regarding quality assurance. The Response summarizes the review process and its attachments contain the call center script, a letter to PURA, and the contract with Alorica. Please confirm that there are no other written policies and procedures regarding the material summarized in the interrogatory response.

OCC-451. (CUSTOMER SERVICE QA SCORECARD) Please provide all customer service quality assurance scorecards completed from January 1, 2025, through December 31, 2025.

OCC-452. (ALORICA) On average, how many calls does Alorica handle per hour?

OCC-453. (LIDR) Please refer to the Response to OCC-114, Attachment 1.

a. Please add columns indicating the total number of customers on each LIDR tier for each month indicated, the number of customers on each LIDR with a life-threatening medical protection designation, and the number of customers eligible for service termination for each LIDR for each month indicated.

b. If current columns d, e, h, k, n, o, and p do not equal the total number of customers on each LIDR tier each month, please explain what additional category of customers is missing and provide (for example, comparing the number of customers indicated in those columns for December 2025 does not equal the total number of customers on LIDR in December 2025 indicated in the Response to OCC-116, Attachment 1).

c. Please separate the customers in Column D by those on MPP, on FPA, and not on a payment arrangement.

OCC-454. (STORM RESTORATION TIME) Please refer to the Response to OCC-124, Attachment 1. Please confirm that the average restoration time indicated is in minutes.

OCC-455. (DATA PRIVACY) Please refer to the OCC-127. The Response does not appear to answer the question posed. If Conn. Gen. Stat. § 36a-701b were amended to include utility account information within the scope of "personal information" under the statute, indicate the costs and system changes necessary for the Company to comply with the revised statute. If no system changes are necessary to comply with the statute, please state so.

OCC-456. (Residential Customer Charge) Refer to Exhibit CLP-RATES-1, at 16, which states that the Company has "applied the method established in Docket No. 17-01-12 and further employed in its last rate case in determining a new, proposed Residential Rate 1 customer charges."

a. Please provide a copy of the document detailing the referenced methodology.
b. Explain, in narrative format, the steps taken by the Company in this rate case to calculate the maximum residential customer charge (MRCC). For each step, provide the relevant page number, columns, rows, and or cells under Exhibit CLP-RATES-2.13.

OCC-457. (Economic Development Rate Rider) Please explain the Company's rationale for proposing an EDR Rider in this rate case. For example, is the primary purpose of the EDR Rider to support Connecticut's state policy goals related to economic development, put downward pressure on rates for the Company's other ratepayers, provide revenue stability for the Company, or something else?

OCC-458. (Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 23, which states that "a schedule of discounted rates would be determined on a customer-specific basis," and at 28, which states that the Company's proposed approach would avoid "administrative complexity associated with variable or negotiated discounts."

a. Please reconcile these two statements.
b. Clarify which components of the EDR would be customer-specific, and which components would be consistent across different EDR customers.
c. Has it previously been the practice of the Company to negotiate discounts with customers on an individual basis? If so, does the EDR mirror the structure of those discounts? If not, why did the Company propose to change the structure?

OCC-459. (Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, which states that the EDR discount would be "anchored to the Company's marginal cost of service."

a. Please explain the methodology for calculating this cost on a per-customer basis. Provide any associated workpapers in live Excel format with all formulas intact.
b. How often does the Company plan to conduct this calculation or other analysis to confirm that revenues collected from each EDR customer are sufficient to recover their incremental cost of service?

OCC-460. (Economic Development Rate Rider) Has the Company received communications from industrial customers expressing interest in the EDR? If so, provide the

industry type of these customers and the total incremental load the Company expects from them.

OCC-461. (Economic Development Rate Rider) Did the Company consult any industrial customers on the structure of the proposed EDR? If so, provide a summary of any feedback the Company received from those customers, and whether and how the Company incorporated that feedback into its proposal.

OCC-462. (Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, where the Company proposes "a declining, time-limited discount applied to incremental load over a five-year term, consistent with the declining structure proposed in the Company's prior economic development rate."

a. Please provide the structure of the discount under the Company's prior EDR.
b. Did the Company consider other participation term durations? If so, provide the alternatives the Company considered and explain why each alternative was ruled out. If not, why not?

OCC-463. (Economic Development Rate Rider) Please provide the tariff for the Company's prior EDR. Highlight any differences between the prior EDR and the EDR proposed in this rate case and provide the rationale for each difference.

OCC-464. (Economic Development Rate Rider) Please clarify whether the following customer types would be able to qualify for the proposed EDR:

a. Customers with large-scale computational loads (i.e., data center);
b. Customers connected to the transmission system;
c. Customers switching from natural gas to electricity, such as for process heating load.

OCC-465. (Economic Development Rate Rider) Please provide the anticipated capacity of data center load additions in the Company's service territory each year for the next 10 years.

a. Provide separate estimates for load requests and firm commitments.
b. Provide any analysis the Company has conducted on the extent to which the anticipated data center load impacts system costs and customer bills. Include associated workpapers in live Excel format with all formulas intact.

OCC-466. (Economic Development Rate Rider) Refer to Exhibit CLP-RATES-3, at 199, which provides that "The Customer shall begin and/or continue implementation of cost-effective conservation (i.e., energy efficiency) and load management measures and programs, as determined appropriate by the Company."

a. Please describe how the company will manage the customer incentive to increase load under the EDR to avoid a conflict with existing energy efficiency and load management objectives.
b. Has the Company considered retroactively adjusting the base period usage of a customer after that customer implemented efficiency improvements? If so, elaborate on how the Company will make this adjustment. If not, why not?

OCC-467. (Economic Development Rate Rider) Refer to Exhibit CLP-RATES-3, at 199, which discusses a process of normalizing base period usage and removing abnormalities to calculate the customer's Incremental Load. Please provide a detailed description of this process, including any associated workpapers in live Excel format with all formulas intact.

OCC-468. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 37, which states that Rate 6 is designed to "ensure no incremental harm to remaining customer classes." Please explain how the Company determined that Rate 6 would cause no incremental harm to the remaining residential customer class (Rate 1), including any quantitative analysis supporting that conclusion. Include any associated workpapers in live Excel format with all formulas intact.

OCC-469. (Rate 6 – Residential Space Heating Rate) Please explain whether Rate 6 was designed to be revenue-neutral on a standalone basis, assuming no load shifting and a range of enrollment scenarios. If so, provide the revenue sufficiency analysis and workpapers, including assumptions regarding enrollment levels and per-customer incremental usage, in live Excel format with all formulas intact.

OCC-470. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 32, which states that Rate 6 will be available to residential customers who currently heat with a delivered fuel heating system. Please clarify whether residential customers with gas heating will be eligible for Rate 6? If not, why not?

OCC-471. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 33, which indicates that Rate 6 customers will receive a distribution energy rate 4.7 cents/kWh lower than Rate 1 for heating season usage above 700 kWh, and 2.8 centers/kWh lower during all other hours. Please provide the revenue impact calculation underlying these discount amounts by season and usage tier, including any sensitivity analysis across different enrollment and load scenarios.

OCC-472. (Rate 6 – Residential Space Heating Rate) In addition to Exhibit CLP-RATES-6, please provide illustrative bill comparisons for a range of Rate 6 customer types

(partial displacement, full displacement, customers with EVs also enrolled) versus a comparable Rate 1 customer and Rate 7 customer, showing monthly net revenue contributions to the distribution system per customer type.

OCC-473. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 23-24. Please state whether the Revenue Decoupling Mechanism is designed to capture any revenue shortfall arising from Rate 6 enrollment diluting Rate 1 revenues. If so, explain how Rate 6-driven revenue loss will be treated under the RDM and which customer classes ultimately bear that cost.

OCC-474. (Rate 6 – Residential Space Heating Rate) Please explain how the two volumetric discount levels (4.7 cents/kWh for heating season usage above 700 kWh and 2.8 cents/kWh for all other usage) were derived. Specifically:

a. Were the discounts calibrated to the incremental cost of serving heat pump load? If so, please provide the calculation and workpapers in live Excel format with all formulas intact. If not, why not?
b. Did the Company consider other discount levels? If so, explain the alternatives considered and why they were ruled out. If not, why not?

OCC-475. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 35-36, which acknowledges that incremental load from EV charging can also benefit from the Rate 6 discount for usage above 700 kWh.

a. Was the discount sized to account for this "free rider" effect? If so, how? If not, why not?
b. What percentage of Rate 6 enrollees does the Company expect to also have EV charging load?
c. Has the Company modeled the revenue impact if a significant share of Rate 6 bill savings is attributable to EV charging rather than heat pump load? If so, provide the associated workpapers in live Excel format with all formulas intact. If not, why not?

OCC-476. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 36, which states that "additional EV charging during winter months can benefit from and contribute to system efficiency while receiving the benefit of reduced costs reflective of the heating season."

a. If the Company believes that EV charging load can provide the same system benefits as heat pump load during winter months, why did the Company not propose that EV charging customers without heat pumps be eligible for Rate 6?

b. Explain whether the Company believes that it is reasonable, from a cost causation and revenue neutrality perspective, for EV charging load to receive a discount during the winter without having to pay higher rates in the summer.

OCC-477. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-6, which shows that the Rate 6 customer charge is $30.95/month, in contrast to the Rate 1 customer charge of $12.36/month. Please explain how the differences in volumetric and customer charges between Rate 1 and Rate 6 were determined and whether the higher customer charge on Rate 6 was designed to offset the volumetric discount on a revenue-neutral basis. Provide the associated workpapers in live Excel format with all formulas intact.

OCC-478. (Rate 6 – Residential Space Heating Rate) Did the Company consider other rate structures to incentivize heat pump adoption, such as a seasonal TOU rate? If so, provide the alternatives considered and explain why each alternative was ruled out. If not, why not?

OCC-479. (Rate 6 – Residential Space Heating Rate) Please provide the Company's summer and winter peak load by customer class under a normal weather scenario, including historical hourly system load data for the past three years. Please also provide:
a. Average hourly load by month and season for the residential class
b. Coincident peak contribution by customer class for summer and winter peaks

OCC-480. (Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 34, which states that Rate 6 can help achieve better system utilization during winter months. Please provide whether and how the 4.7 cent and 2.8 cent discount amounts bear any relationship to seasonal marginal cost differentials derived in the marginal cost of service study.

OCC-481. (Rate 7 – Residential TOU Rate) Please describe how the on-peak and off-peak periods under Rate 7 were selected and provide the data and workpapers used to inform the selection of these periods, such as historical or forecast hourly system load data, class load shapes, hourly or seasonal marginal costs, or other relevant information. Please provide this data in machine-readable, native format.

OCC-482. (Rate 7 – Residential TOU Rate) Please explain whether the Company has the capability to implement TOU distribution and supply rates. If so, why does Rate 7 only include TOU transmission rates but not TOU distribution or supply rates? If not, why not?

OCC-483. (Rate 7 – Residential TOU Rate) Please explain how the TOU prices were derived, including the methodology and rationale for the on-peak to off-peak ratio under Rate 7. Please provide all supporting workpapers in live Excel format with all formulas intact.

OCC-484. (Rate 7 – Residential TOU Rate) Please provide the most recent evaluation of customer usage patterns and bill savings under Rate 7.

OCC-485. (TVR Customer Engagement Plan) Refer to Exh. CLP-RATES-8, at 8.

a. Which customers does the Company plan to target for outreach during the Consideration phase (e.g., high-usage customers, customers with EV charging load or other DERs)?
b. How does the Company plan to identify these customers?

OCC-486. (Rate 6 - Monthly Cost) In an unlocked Excel spreadsheet, provide monthly, quarterly and seasonal comparisons of a Heat pump ratepayer utilizing Rate 5 and proposed Rate 6 for the following scenarios:

a. 700 kWh usage
a. 1200 kWh usage
b. 700 kWh plus the usage of 1 EV
c. 700 kWh plus the usage of 2 EVs.

Respectfully submitted,

STATE OF CONNECTICUT OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White
Kimberly White
Staff Attorney

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 East Haddam, Connecticut this 25th day of August, 2026.

By: /s/ Kimberly White

Kimberly White Esq.
Commissioner of the Superior Court