Date Filed: October 30, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:
(ENVIRONMENTAL REMEDIATION) See, e.g., Application, Ex. CLP-ENV-1, pp. 15, 20Provide the following information regarding the Company's compliance with Connecticut's Release-Based Cleanup Regulations (RCBRs), Conn. Agencies Regs. § 22a-134tt-1 et seq., and any other applicable standards, statutes, or regulations:

a. A narrative description of all data reporting requirements, required approvals, and required communications with the Department of Energy and Environmental Protection (DEEP) and the Department of Public Health set forth in the RCBRs;
b. Any Remediation Action Plans (RAPs) and reports submitted to DEEP for each of the 19 complex environmental remediation sites;
c. Documentation showing RAP approvals or other approvals from DEEP; and
d. Any progress updates provided to DEEP.

Response:

Please refer to the following narrative along with referenced supporting attachments in response to this request.

RS #5 Rockville MGP

a. This former MGP site is in DEEP's Voluntary Remediation Program (VRP) and Significant Environmental Hazard (SEH) Program. Annual Status Reports and SEH Status Update Forms were submitted to DEEP as required. The site has not yet been entered into the Release Based Cleanup Regulations (RBCRs) Site-Wide Program.

b. A RAP has not yet been completed for this site. Please refer to RSR-032, Attachment 1, and RSR-032, Attachment 2.

c. Not applicable. DEEP has not provided a response regarding the Screening Level Ecological Risk Assessment (SLERA) and Revised SLERA (RSLERA) which were submitted in March 2021 and May 2023, respectively.

d. VRP Annual Status Reports and Annual SEH Status Update Forms were submitted to DEEP as required. Please refer to RSR-032, Attachment 3, through RSR-032, Attachment 22.

RS #8 Torrington Former MGP

a. This site is not enrolled in a formal DEEP cleanup program. Therefore, there are no reporting requirements to DEEP or Department of Public Health (DPH). Investigation work conducted during the rate case time period was to evaluate the current environmental condition at the site.

b. This site is currently undergoing investigation. A RAP has not yet been developed. No reports have been submitted to DEEP for this site during this rate case period.

c. There is no RAP, or documents requiring approval for this site. No documents have been submitted to DEEP for this site.

d. No progress updates are required or have been submitted to DEEP for this site.

RS #9 Winsted Former MGP

a. This site is not enrolled in a formal DEEP cleanup program but does have an active Significant Environmental Hazard (now Significant Environmental Release under the RBCRs) notification. The SEH notification was submitted to DEEP in January 1999. Annual SEH update reports are required to be submitted to DEEP. No other data submittals, approvals, or communication to DEEP or DPH are required.

b. This site is currently undergoing investigation. A RAP has not yet been developed. Aside from annual SEH status update reports, no other reports have been submitted to DEEP for this site during this rate case period.

c. No RAP has been developed for this site. DEEP does not provide approvals for the SEH updates submitted to them.

d. Annual SEH Status Updates have been submitted to DEEP for this site. Status Updates for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 23, through Attachment 29. No other progress updates have been provided to DEEP.

RS #23 Ridgefield Rail Trail

a. The site is a former railroad bed that is currently a transmission right-of-way (ROW) and improved by a rail-to-trail recreational space. In December 1998, due to the discovery of elevated concentrations of arsenic from suspected railroad pesticide application in surface soils, a SEH Notification was submitted to DEEP.

In 2000, a liner system was installed across the entire former railroad bed between Prospect Street and Florida Road. The liner system consists of stone screenings and processed aggregate placed over a geocomposite, geomembrane, and geotextile, serving as a protective cap. These measures effectively mitigated the identified SEH condition.

A Maintenance and Observation Plan is followed which is designed to reduce the risk of liner exposure by identifying and addressing potential problems before they materialize. Semi-annual inspections have been conducted in April and October to visually assess drainage systems, trail surface erosion, slope stability, sediment accumulation within swales, and vegetative growth. Based on inspection findings, maintenance and repair activities have been performed as necessary.

Annual SEH Status Update Forms have been submitted to DEEP as required.

b. A RAP was submitted to DEEP in June 2000. Please refer to RSR-032, Attachment 30, through RSR-032, Attachment 32.

c. The Company did not receive correspondence from DEEP indicating RAP approval. DEEP does not normally provide approvals of RAPs.

d. Annual SEH Status Update Forms were submitted to DEEP as required. Please refer to RSR-032, Attachment 33, through RSR-032, Attachment 39.

RS #27 Portland, CT ROW#2

a. This Site is not currently in a regulatory program, thus there are no reporting requirements, required approvals, and no formal regulatory communications with DEEP. This site is partially a Transmission line right of way and partially leased to a gravel mining operation. The Site is fully characterized, and various remedial options have been presented.

b. A decision on the remedial path has not been selected, and no RAPs or other reports or updates have been submitted to DEEP.

c. A decision on the remedial path has not been selected, and no RAPs or other reports or updates have been submitted to DEEP.

d. A decision on the remedial path has not been selected, and no RAPs or other reports or updates have been submitted to DEEP.

RS #52 Williams Street Substation

a. PCB impacts were discovered during a soil characterization exercise to support a construction project within the substation. The PCBs were remediated under a Performance Based Cleanup program dictated by EPA which does not require a RAP submittal or any progress reports. At the conclusion of the remediation in April 2019, DEEP requested groundwater compliance monitoring to be conducted. DEEP emailed Eversource on January 17, 2020, saying they reviewed the Summary of Remedial Actions for PCB Impacted Soil at Williams St 9L Substation and DEEP had no further comments or questions. Groundwater was monitored from 2019 to 2023. In February 2024, a Compliance Monitoring Closure Report for PCB Remedial Actions was submitted to DEEP for review. DEEP emailed back on May 6, 2024, that the Corrective Action Unit reviewed the document, and they stated they are not requesting any further remedial actions.

b. No Remedial Action Plan was required nor generated.

c. No RAP approvals obtained. DEEP did not offer any approvals other than no further comments via email on the Summary of Remedial Actions, and Compliance Monitoring Closure Report. Please refer to RSR-032, Attachment 40, and RSR-032, Attachment 41.

d. No progress reports were required.

RS #55 Hunts Brook Fly Ash Site

a. This site is not enrolled in a formal DEEP cleanup program but does have an active Significant Environmental Hazard (now Significant Environmental Release under the RBCRs) notification. The SEH notification was submitted to DEEP in May 2007 for an SEH condition in groundwater and in May 2020 for an SEH condition in soil. Annual SEH update reports are required to be submitted to DEEP. No other data submittals, approvals, or communication to DEEP or DPH are required.

b. This site is currently undergoing investigation. A RAP has not yet been developed. Aside from annual SEH status update reports, a Site investigation Report was submitted to DEEP in October 2021. No other reports have been submitted to DEEP for this site during this rate case period.

c. No RAP has been developed for this site. DEEP does not provide approvals for the SEH updates or Site Investigation Reports submitted to them.

d. Annual SEH Status Updates have been submitted to DEEP for this site. Status Updates for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 42, through RSR-032, Attachment 48. No other progress updates have been provided to DEEP.

RS #56 Historic Transformers (Capewell)

a. This site was placed into the reserves around 2004 when a pad mounted PCB transformer was vandalized and oil leaked into soil beneath the transformer and adjacent to the building. Multiple remediation events were completed between 2004 and 2009. Eversource conducted the emergency response cleanup and investigation and later the property owner conducted additional remediation as part of the property redevelopment. Eversource and the property owner agreed to a settlement agreement and the final payment under a settlement agreement was made in December 2020, when the property owner was able to complete an Environmental Land Use Restriction on the property. Then the property owner issued a General Release for further claims in early 2021, so the site was removed from the Reserves.

b. Eversource was not required to submit a RAP.

c. No RAP approvals were obtained.

d. No progress reports were generated or submitted to DEEP.

RS #58 Former Enfield AWC

a. This site is currently enrolled in the Property Transfer Program. CL&P is the Certifying Party on a Form III submittal in January 1998. Currently, CL&P plans to complete LEP verification of the site under the requirements of the Property Transfer Act. This includes the submission of annual status update reports, completion of investigation report, remediation action plan(s), and a final LEP verification report to DEEP. Previously submitted reports are discussed further in responses to additional questions/requests.

b. The original RAP for the remediation related to the UST release is not readily available electronically. A paper copy may be available in offsite storage. A RAP addendum was submitted to DEEP concurrently with the 2012 Annual Status Report. The addendum was to address remediation required in the area of the buried utility system debris.

c. A RAP and RAP addendum have been submitted to DEEP, however; DEEP does not typically provide approvals for RAPs. Therefore, documentation showing approval of the RAP or RAP addendum by DEEP is not available.

d. Annual Status Reports have been submitted to DEEP for this site. Status reports for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 49, through RSR-032, Attachment 54. No other progress updates have been provided to DEEP.

RS #63 Berlin Settling Basin

a. PCB-impacted sediment/soil was identified during basin maintenance in 2011, prompting investigation of the basin, uplands, and adjacent unnamed stream until 2018. A DEEP Consent Order was finalized in December 2018. The Consent Order had numerous conditions including submittal of quarterly progress reports until all conditions of the Consent Order are satisfied. A Notification of Significant Environmental Hazard (NSEH) was reported on October 1, 2012. Annual SEH status reports were sent to DEEP. The last Annual SEH status report was submitted in March 2022, after the remediation was complete. A PCB Cleanup and Risk Based Disposal Approval Request was submitted to EPA on January 25, 2019. EPA Approved the Cleanup Plan on June 27, 2019. DEEP approved the Cleanup Plan on August 7, 2019. Eversource requested a modification to the approval and EPA approved the modification on April 7, 2020. A second request for modification of the approved RAP was submitted on December 10 2020, and approved by EPA on December 18, 2020. A Post Remediation Groundwater Monitoring Plan was submitted to DEEP on July 9, 2021. DEEP approved the Groundwater Monitoring Plan on July 27, 2021. A Federal Use Restriction was recorded on the Town of Berlin Land Records on December 8, 2021. The Environmental Land Use Restriction was recorded on December 18, 2025.

b. A RAP titled a PCB Cleanup and Risk Based Disposal Approval Request was submitted to EPA and DEEP on January 25, 2019. An earlier draft RAP for a hybrid Self Implementing Plan and Risked Based Cleanup Plan was created and circulated to DEEP but later withdrawn and replaced with the RAP submitted in 2019. Please refer to RSR-032, Attachment 55, for a copy of the RAP Report.

c. EPA approved the RAP received on June 27, 2019 and DEEP approved the RAP on August 7, 2019 and both are included. Both approvals of the two modifications to the RAP approval are also included. The approval of the groundwater monitoring plan by DEEP is also included. Please refer to RSR-032, Attachment 56, through RSR-032, Attachment 60, for the approvals.

d. Twentynine progress reports required by the Consent Order and the SEH annual reports are included in RSR-032, Attachment 61, through RSR-032, Attachment 98. However, the 2013 SEH annual progress report is not available and likely not created because there was a meeting with DEEP, EPA, and Eversource in 2013.

RS #64 Property Transfer Wethersfield

a. The site (176 Cumberland Avenue, Wethersfield) was previously owned and then leased back to CL&P in the 1950′s. In 1998, Wethersfield LLC purchased the property and CL&P continued to be a tenant until 2006. In 2012, Wethersfield LLC sold the property and filed a

Form III and Environmental Condition Assessment Form (ECAF), per the Transfer Act. CL&P was not the certifying party or responsible for verification but was responsible for remedial excavation of a limited impacted soil area and post-remediation groundwater monitoring. Annual status reports were subsequently submitted and the annual reports for 2017 through completion in 2022 are provided as RSR-032, Attachment 99, through RSR-032, Attachment 109.

b. The RAP was submitted on August 27, 2013, for the excavation work which was completed in Q3 2013. Please refer to RSR-032, Attachment 110.

c. No approvals have been received or are expected, as CL&P is not the Property Owner or Certifying Party for this site.

d. Annual progress updates were submitted from 2017 to 2022. The 2021 Completion of Investigation COI was submitted and the on-site wells were decommissioned. Please refer to RSR-032, Attachment 111.

RS #66 East Hampton

a. On November 4, 2019, CL&P submitted a Request for Closure of a Significant Environmental Hazard for a 2012 hydraulic lift release. The Request for Closure Report includes the initial SEH Notification submitted in April 2012, DEEP's Acknowledgement of the SEH Notification, the 60-day report required by the Acknowledgement and the subsequently requested year of quarterly sampling results submitted to DEEP in April 2014. In addition, the SEH Request for Closure also included another round of residential well sampling results requested by DEEP in 2018. The sample results were all well below the applicable groundwater protection criteria. On February 24, 2026, CL&P resubmitted the 2019 SEH closure request due to delayed engagement by the DEEP and in anticipation of the new RBCRs taking effect (See RSR-032 Attachment 115 and RSR-032 Attachment 116). On April 16, 2026, CL&P received a Certification of Compliance for the 2012 SEH, the submittals and approvals for the SEH were also sent to the Director of Health at the Chatham Health District. Reports referenced above represent the progress updates submitted to DEEP during this period. Please refer to RSR-032, Attachment 112, through RSR-032, Attachment 114.

b. – d. RAPs have been prepared for this site. Other reports and approvals are identified above.

RS #67 Madison AWC (closed December 2025-adjustments January 2026)

a. Groundwater & Environmental Services Inc. (GES) developed a RAP and site-specific plans and specifications for a competitive bid for the remedial contractor to implement an excavation approach. Please refer to RSR-032, Attachment 117.

b. The RAP was submitted to DEEP on September 30, 2022. Please refer to RSR-032 Attachment 117.

c. A RAP approval is typically not issued by DEEP. The remedial contractor bid was awarded to True Blue on April 18, 2023. Remedial activities were completed between June and September 2023.

d. A Remedial Action Report (RAR) was submitted to DEEP on December 7, 2023 (Please refer to RSR-032 Attachment 118). A post remedial groundwater monitoring program, consisting of quarterly groundwater sampling events, was completed between January and October 2024. A LUST closure report was submitted to the DEEP on March 14, 2025 (See RSR-032, Attachment 119).

   GES provided an LEP Opinion Letter on October 27, 2025 (RSR-032 Attachment 120), indicating that the former USTs were closed properly, and that soil and groundwater associated with the historical gasoline release(s) had been investigated and remediated in compliance with the Connecticut UST regulations and the remediation regulations in effect at the time work was completed. The Site was closed and removed from the reserve in December 2025/January 2026. See also, RSR-032, Attachment 121, for a well decommissioning letter.

RS #68 Former Simsbury AWC

a. This site is currently enrolled in the Property Transfer Program. CL&P is the Certifying Party on a Form III submittal in January 2002. Currently, CL&P plans to complete LEP verification of the site under the requirements of the Property Transfer Act. This includes the submission of annual status update reports, completion of investigation report, remediation action plan(s), and a final LEP verification report to DEEP. Previously submitted reports are discussed further in responses to additional questions/requests.

b. This site is currently undergoing investigation. A RAP has not yet been developed. Several quarterly and annual update reports as well as a Final Site investigation Report for a portion of the site have been submitted to DEEP during this rate case period.

c. No RAP has been submitted to DEEP. Other documents that have been submitted to DEEP for this site have not received approvals. DEEP does not normally provide formal approvals of RAPs or update reports.

d. Annual Status Reports have been submitted to DEEP as required in the Property Transfer Act Schedule. A copy of the status reports for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 122, through RSR-032, Attachment 160.

RS #103 Parsons Lane Durham

a. This site is in DEEP's Spills Program. The Final Remedial Action Report was submitted to DEEP in 2025 and this spill case was closed in 2026. This case is not subject to the RBCRs. A summary of key milestones during the rate case time period is provided below:

- October 19, 2018 – A spill involving mineral oil dielectric fluid (MODF) containing polychlorinated biphenyls (PCBs) >50 parts per million (ppm) was reported to DEEP, and Case No. CWC-18-05541 was assigned.
- May 7, 2019 – The Interim Remedial Action Report (IRAR) was submitted to DEEP and EPA.
  - This report summarized emergency response actions, follow-up investigations, and interim remediation activities conducted between October 2018 and April 2019.
  - It also recommended additional investigation, ecological risk assessment, and potential remedial actions based on the findings.
- November 21, 2019 – The Ecological Risk Assessment Work Plan was submitted to DEEP and EPA.
  - The work plan was developed with DEEP concurrence.
  - At that time, EPA indicated that review would be deferred and that we should proceed in accordance with DEEP's recommendations.
- December 15, 2021 – The Screening-Level Ecological Risk Assessment (SLERA) Letter Report was submitted to DEEP and EPA.
  - This report summarized sediment analytical results from 2018 and 2021, compared them to applicable risk criteria, and identified areas requiring remediation.
- March 15, 2024 – The RAP was submitted to DEEP.
  - The RAP outlined the approach for addressing five PCB-impacted stream areas identified in the SLERA and incorporated DEEP's recommendations.
  - The sediment remediation work was completed in October and November 2024.
- February 28, 2025 – The Final Remedial Action Report (FRAR) was submitted to DEEP and EPA.

- This report summarized investigation and remedial activities conducted between 2020 and 2024 and referenced the interim response actions documented in the IRAR.
- It concluded that the cumulative response actions completed between 2018 and 2024 are sufficient and that no further investigation or remediation is warranted.

- This spill case has been closed.

b. A RAP was submitted to DEEP in March 2024. Several other reports were submitted during this rate case time period (See copies of these reports in RSR-032, Attachment 161, through RSR-032, Attachment 165).

c. DEEP did not provide formal RAP approval. DEEP approval is not required as this remediation was led by a LEP. However, DEEP was involved with the direction of the SLERA which guided identification of the sediment remediation that was completed. DEEP ultimately responded with no further comments on the FRAR.

d. No other progress update reports were submitted to DEEP. DEEP was updated on project status verbally by Eversource during monthly PCB meetings.

RS #117 Berlin Campus

This reserve site is comprised of two separate releases at the Berlin Campus that were reported to DEEP: 1) a gasoline LUST that impacted soil and groundwater and 2) a ceiling air handling unit water release which caused sheens to appear on concrete within an oil tank containment area.

- UST Tank J11 LUST:
  - In 1997, a release was reported to DEP, when approximately two gallons of gasoline was discovered pooled within the top of UST Tank J11 located adjacent to the Central Maintenance Service (CMS) Building which had previously been abandoned in place by pouring concrete inside the tank. The tank and surrounding soil was removed. A subsurface investigation (via drilling) was performed to delineate soil and groundwater impacts. Based on the findings, NUSCO informed DEEP that a soil vapor extraction system was being installed, and it operated for 20 years. The system was shut down in 2024.

  - Between 2024 and 2025, a follow-up soil and groundwater investigation was performed to confirm the nature and extent of the release area. In July 2025, a release investigation report was submitted to DEEP which concluded prior remediation and natural attenuation processes have reduced contaminant concentrations in soil to below RSR criteria. Groundwater monitoring data

demonstrates concentrations of dissolved phase constituents are decreasing, and the plume is in a diminishing state. A post-remedial groundwater monitoring program consisting of quarterly groundwater sampling to evaluate monitored natural attenuation as a remedial solution was recommended. This program began in Q4 2025, and the quarterly report was submitted to DEEP in February 2026.

- CMS Building Tank Room C Containment PCB Release:

  - In July 2021, following a release of water from a ceiling air handling unit to the tank containment area in the CMS Building Tank Room C, sampling was performed which identified the presence of PCB >50 ppm within the concrete containment area from historic operations. The condition was reported to the DEEP Spills Division.
  - In December 2024, the concrete surface within the tank containment area was encapsulated by applying two coats of contrasting colored epoxy paint. In March 2025, the Tank Room C PCB Encapsulation Completion Report was submitted to DEEP and EPA, and informed that an Annual Inspection, Maintenance, and Monitoring Plan (IMMP) would be implemented.

b. RAPs have not been submitted to DEEP for either of these releases.

e. EPA and DEEP email correspondence in response to the Tank Room C PCB Encapsulation Completion Report is provided in RSR-032, Attachment 166.

f. Post-remediation quarterly groundwater monitoring updates are submitted to DEEP (See RSR-032, Attachment 167, and RSR-032, Attachment 168). DEEP was updated on project status verbally by Eversource during monthly PCB meetings.

RS #118 2 Main Street Enfield CT

a. This site was historically occupied by an approximately 9,000 square foot former electric power generation facility from approximately 1953 until 1982. The site is currently vacant. A hazardous building materials assessment confirmed there are building materials that require remediation. Previous subsurface investigations indicate the need for remediation as well. This Site is not currently in a regulatory program, thus there are no reporting requirements, required approvals, and no formal regulatory communications with DEEP.

b, c, d. No RAPs or other reports or updates have been submitted to DEEP.

The site is under a purchase & sale (P&S) agreement with four other adjacent and nearby parcels (P&S agreement executed on 11/3/2025).

RS #119 Windsor Operations Center

a. Historically the Site was used for agricultural land (tobacco cultivation) and residential since at least 1934. The Site was redeveloped with the current building and improvements between 2000 and 2001. JDS Uniphase (JDS), a fiber optic component manufacturer, occupied the Site from 2001 to 2004. JDS was an SQG. After JDS, CL&P utilized the building onsite to use as a call center. This site is currently enrolled in the Property Transfer Program. An ECAF and Form III were submitted in December 2021. CL&P is the Certifying Party on a Form III. The ECAF is included in Attachment 169. Phase I through III site investigations on site indicated multiple areas impacted at concentrations above the applicable standards. We are in the process of excavating PCB impacted soil on site. Currently, CL&P plans to complete LEP verification of the site under the requirements of the Property Transfer Act. This includes the submission of annual status update reports, completion of investigation report, remediation action plan(s), and a final LEP verification report to DEEP. Previously submitted reports are discussed further in responses to additional questions/requests.

b. A copy of the Form III (RSR-032, Attachment 170), Final Site Investigation Report (RSR-032, Attachment 175), and RAP (RSR-032, Attachment 176) are included. One annual status report has also been submitted (RSR-032, Attachment 177). No other reports have been submitted to DEEP for this site during this rate case period. One letter that was submitted to DEEP requesting approval for the reuse of topsoil has been included as RSR-032, Attachment 178.

c. A RAP was submitted to DEEP, however; DEEP does not typically provide approvals for RAPs. Therefore, documentation showing approval of the RAP by DEEP is not available. (See RSR-032, Attachment 176).

e. One Annual Status Update (2025) has been submitted to DEEP as required in the Property Transfer Act Schedule. A copy of the status update has been included in RSR-032, Attachment 177.

RS #121 Bartholomew 18

a, b, c, d. There are currently no data reporting requirements, required approvals, or communications with the DEEP or DPH as set forth in the RBCRs required for Bartholomew 18 as the reserve was recently established. Phase I Environmental Site Assessment activities are in progress and there has been no discovery of releases at the site to date and the site is not currently in a regulatory program.