Date Filed: November 02, 2026

Witness: Warren R. Boutin, Brendan J. O'Brien, Leanne M. Landry, Garrett J. Murray and Jeffrey D. Turano
Request from: ALLCO

Question:

(Follow-up to ALLCO-124 — the Keegan Werlin redaction engagement.) The response answers subpart (a) by reference to ALLCO-027, which concerns the rate case engagement, not the "high-volume redaction and confidentiality-designation services" for which the Company said in ALLCO-034(b), that Keegan Werlin "was only recently engaged." State: (a) the date of that engagement, whether it is a separate engagement or an expansion of the rate case engagement, the hourly rates or other basis of compensation, any budget, estimate, or not-to-exceed amount, and the Company personnel who approved it, and produce the engagement letter, statement of work, or e-mail by which it was made; (b) the hours recorded by Keegan Werlin on redaction and confidentiality-designation work through September 30, 2026 and through the most recent date available, whether or not invoiced; (c) TCDI's total billings through the most recent date available and the Company's current estimate of total TCDI cost for the proceeding; (d) for each month since the Application was filed, by title, the hours and loaded cost of internal legal, project-management, and regulatory personnel devoted to redaction and confidentiality-designation work, using time records where they exist and a documented estimate stating its basis where they do not; and (e) the account(s) to which each amount has been charged and whether any amount has been deferred.

Response:

The Company objects to this request as this question has been asked and answered. The Company has provided responsive answers in ALLCO-034[i], and ALLCO-124[ii], and already committed to supplement its response with additional information, as necessary, once it becomes available. Allco's request is cumulative and does not advance the development of the evidentiary record. Conn. Gen. Stat. § 4-178(1) (administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence). Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Prior Referenced Responses:

[i] 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).

[i] 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.

[ii] ALLCO-124 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.

ALLCO-124 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.