STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: APPLICATION OF THE	**:**	
CONNECTICUT LIGHT AND POWER	**:**	**DOCKET NO. 26-05-10**
COMPANY D/B/A EVERSOURCE	**:**	
ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**OCTOBER 1, 2026**

CONSERVATION LAW FOUNDATION AND ACADIA CENTER JOINT SECOND SET OF INTERROGATORIES

Conservation Law Foundation ("CLF") Acadia Center request responses from the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company") to the following interrogatories in the above-captioned proceeding by October 15, 2026. If there are objections to any questions, or if providing responses to any questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

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 document.

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.

F. Where an Interrogatory asks to provide all documents please provide all data, assumptions, schedules, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of live unlocked Microsoft Excel spreadsheet files with all cell references/links and formulae intact.

G. Each Interrogatory to provide all documents or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

H. If the Company finds any request to be ambiguous, please notify Conservation Law Foundation through their counsel so the request can be clarified prior to the preparation of a written response.

I. If information requested is not available and cannot be made available in the exact form requested, provide such information or documents as can be made available that best respond to the request.

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 requests 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 is adopted by the Authority in this Docket.

INTERROGATORIES

Interrogatories CLF-AC-13 through CLF-AC-20 are directed to the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company").

CLF-AC-13: (Productivity Factor) Refer to Exhibit CLP-PBR-2, Section 2.2.

(a) Confirm whether the Company's proposed productivity factor is derived using an indexing (historical peer performance) methodology rather than an efficiency frontier analysis.

(b) Please identify every methodology considered in deriving the Company's proposed productivity factor and state the criteria used to select the indexing methodology over the alternatives.

(c) If an indexing methodology was used as confirmed in (a) above, produce all workpapers, memoranda, and analyses used that compared the index method to efficiency frontier analysis for purposes of this proceeding, including any cost-benefit or sensitivity analysis of the two approaches.

CLF-AC-14: (Productivity Factor) Refer to the Company's and/or LEI's prior positions on productivity factor methodology in other jurisdictions.

(a) Identify any prior PURA (or other state commission) docket in which the Company or LEI have advocated for or applied an efficiency frontier methodology, and explain any difference in position taken in this proceeding.

(b) State whether the Company agrees that an efficiency frontier approach would better isolate achievable productivity gains by benchmarking against best-practice utilities rather than the Company's own historical peer group. If the Company disagrees, please explain why, with supporting data.

(c) Quantify what the productivity factor would be under an efficiency frontier methodology using the same or comparable underlying data, or explain why such a calculation was not performed.

CLF-AC-15: (Productivity Factor) Refer to Exhibit CLP-PBR-2.

(a) Identify all datasets used in LEI's productivity factor study (hereinafter the "Study"), and for each dataset state whether it is publicly available.

(b) For each dataset that is not publicly available, please describe its source, how the Company compiled the dataset, and why a non-public dataset was used instead of a publicly available standardized dataset.

(c) Please state whether LEI compared results derived from its proprietary/non-public dataset against results derived from publicly available data and, if so, produce all data, workpapers, and calculations showing how that comparison was performed.

CLF-AC-16: (Productivity Factor) Refer to the U.S. Bureau of Labor Statistics' (BLS) Total Factor Productivity ("TFP") data for the utilities industry (available at https://www.bls.gov/productivity/tables/, "Total factor productivity by major industries"), and Exhibit CLP-PBR-2, Section 2.5 (productivity factor formula).

(a) Please explain why the Study did not rely on the BLS TFP data for utilities as its primary data source or as a verification or validation source for the Study's results.

(b) Applying the Section 2.5 formula to the BLS TFP data for utilities, confirm or refute that average productivity growth over the 2005-2024 period is approximately 0.457%. If the Company's calculation differs, please demonstrate how the calculation was completed and explain the discrepancy.

(c) Discuss every difference between the "output" metric selected for the TFP analysis used in Exhibit CLP-PBR-2, (e.g., "number of customers"), and the output metric used by BLS.

(d) State whether the Company has a fully replicable model (data plus formulas) underlying the Study's recommended productivity factor, sufficient for intervenors' experts to independently verify and stress-test the result. If yes, please include a copy of said model as part of the Company's response to this question. If such a model will not be produced and shared for analysis by other stakeholders, please explain why not.

CLF-AC-17: (Productivity Factor) Refer to the productivity factor(s) recommended in the Study, including any component factor for capital expense, and the Company's proposed revenue cap formula.

(a) State whether the recommended productivity factor, or any factor, is negative for any year(s) in the Study period, and if so, identify each such year and the value.

(b) Provide all analyses showing the revenue or rate base impact to ratepayers in each year of the study period that would result from applying a negative productivity factor, as compared to a factor floored at zero.

CLF-AC-18: (Productivity Factor) Refer to Exhibit CLP-PBR-2, p. 12, and the Study's use of "number of customers" as the output metric in the index method. Explain why the Study uses number of customers as the output metric, and state whether the Company agrees that growth in customer count is not a goal the Company can materially influence, depend upon, or utilize as a justification for seeking an increased revenue requirement.

CLF-AC-19: (Productivity Factor) Please **r**efer to the Company's cost-of-service/rate-base-driven earnings model.

(a) Explain why a capital-expense-based productivity factor calculated against customer growth is an appropriate basis for setting the revenue cap, given that the Company earns a return on capital additions to rate base regardless of whether customer count increases.

(b) State whether the Company agrees that it has a financial incentive to increase capital spending independent of customer growth. If not, please explain the basis for disagreement.

CLF-AC-20: (Productivity Factor) Refer to Exhibit CLP-PBR-2, Figure 3, page 13; the U.S. Bureau of Labor Statistics' Total Factor Productivity ("TFP") data for the "private business sector" (https://www.bls.gov/productivity/tables/, "Total factor productivity by major sectors: private business and private nonfarm business"); and Exhibit CLP-PBR-2, Section 2.5 (productivity factor formula).

(a) Explain whether the Company or LEI considered using the private business sector TFP series as the basis, or a cross-check, for the productivity factor in this proceeding, and if considered as the productivity factor for the Company in the rate case and rejected, please explain why.

(b) Please state whether the Company believes a private business sector TFP more closely approximates the productivity gains a utility could achieve if it were financially incentivized to reduce costs as if its rate of return was unregulated (i.e. as if it were a private corporation). If the Company does not agree with this position, please state why.

(c) Quantify the productivity factor that would result from applying the private business sector TFP series over the same study period, and compare it to the blended/total TFP factor derived from the Study's chosen methodology.

(d) Applying the Section 2.5 formula to the BLS TFP data for the private business sector, confirm or refute that average productivity growth over the 2005-2024 period is

approximately 0.678%. If the Company's calculation differs, please provide the calculation and explain the discrepancy.

(e) State whether the Company will produce all raw data, assumptions, and calculations underlying the Study's recommended productivity factor, sufficient for intervenors' experts to independently verify and stress-test the result. If not, please explain why not.

Respectfully submitted,

/s/Dave Sherry
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CERTIFICATE OF SERVICE

This is to certify that on October 1, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served via electronic mail upon all parties designated on the Authority's official service list in the applicable proceeding in accordance with R.C.S.A. § 16-1-15.

/s/ Dave Sherry

Dave Sherry
Michaud Law Group LLC