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**
		:	**SEPTEMBER 22, 2026**

THE OFFICE OF CONSUMER COUNSEL'S
TWENTY-FIRST 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 6, 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-861 through OCC-866 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-861. **(ACOSS)** Refer to Exhibit CLP-ACOS-1, page 6, lines 6:7, regarding the use of class NCPs.

a. Please explain whether a class's NCP accurately reflects the class's contribution to the capacity requirements for substations and feeders, which may peak at different times than the class.

b. Please explain whether the Company considered using more detailed class load data for each feeder and substation to more accurately allocate costs associated with each class's load during the peak hours for each feeder or substation. If yes, please explain why the Company did not use this method. If no, please explain why not.

c. For each of the Company's substations and feeders, please provide an Excel workbook with the 8760 load data for each of the past three years, as well as the feeder or substation name/number. If the requested data are not available, please

provide the data that most closely match that requested (e.g., the date and time of the equipment's peak demand, as well as the maximum MVA demand for each of the last three years.)

d. Does the Company have the ability to provide class load data for each substation and/or feeder for each of the past three years? If yes, please provide this data in an Excel workbook. If not, please explain what would be required to provide this data.

e. Please provide the system 8760 load data for each class for each of the past three years in an Excel workbook.

OCC-862. **(RATE 6 – RESIDENTIAL SPACE HEATING RATE)** Refer to Exh. CLP-RATES-6, at 2. Please provide all supporting calculations and documentation, in live Excel format with all formulas intact, for the following values:

a. The marginal customer cost of $28.98/customer-month.

b. The marginal facilities cost of $24.51/customer-month. Please identify the FERC accounts included in the calculation of marginal facilities cost.

c. The system peak coincidence factors of 25.6% with space heating and 40.1% without space heating.

OCC-863. **(RATE 6 – RESIDENTIAL SPACE HEATING RATE)** Please provide the following data, in native Excel format with all formulas intact, for the most recent 3 consecutive years for which historical data is available and 3 future years for which forecasted data is available:

a. Average hourly system load data by month;

b. Average hourly marginal costs by month;

c. Maximum monthly system peak;

d. 8760 load data for the residential class.

OCC-864. **(RATE 6 – RESIDENTIAL SPACE HEATING RATE)** Refer to the Company's response to CLF-002. Please provide, in live Excel format with all formulas intact, all supporting analysis and documentation for the statement that "conversion to heat pump typically increases the household's total energy bill at current prices." Clarify the electric and gas rate designs the calculations of "current prices" were based on.

OCC-865. **(RATE 6 – RESIDENTIAL SPACE HEATING RATE)** Has the Company conducted any analysis on the expected enrollment into Rate 6, and resulting attrition from other residential rates offered?

OCC-866. **(RATE 6 – RESIDENTIAL SPACE HEATING RATE)** Please explain how Rate 6 would function with the low-income discount rate, specifically explaining if financial hardship customers on Rate 6 would receive the full LIDR discount as well as the incentivized discount incorporated into Rate 6.

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 22nd day of September, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court