Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(FRAUDULENT ACCOUNTS) Please refer to the Response to EOE-71. If someone opens an account via Eversource.com and enters a minor's legitimate name, address, and Social Security Number, will the system prevent the establishment of the account for someone under the age of 18?

Response:

Eversource.com does not allow the opening of an account using a minor's information. If this is attempted, a message is displayed stating you must be 18 years old.

Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Shamus O'Brien
Request from: Office of Consumer Counsel

Question:

(COMPLAINT DEFINITION) Please refer to the Response to EOE-95. Is the Company stating that a "complaint" must come from a government entity or government individual and that a complaint cannot come directly from a customer to the Company? If yes, is every customer contact with the Company considered an "inquiry"? If no, please explain and indicate all ways in which the Company may receive a customer complaint.

Response:

The Company is not stating that a complaint must come from a governmental entity or governmental individual, nor is it stating that complaints cannot come directly from customers. As described in Response to OCC-136[i], the Company receives customer complaints and concerns directly through its Contact Centers and other customer service channels. These matters are generally managed through the Company's customer-inquiry escalation process, which is designed to investigate and resolve customer concerns regardless of whether they are characterized as an inquiry, concern, or informal complaint.

The Company's reference in EOE-095[ii], to complaints from channels such as the Public Utilities Regulatory Authority ("PURA"), the Attorney General, elected officials, Government Affairs, or escalations to leadership was intended to describe the Company's definition of a formal complaint for purposes of that response. Formal complaints are one subset of customer complaints and concerns that come to the Company's attention through specific escalation channels.

The Company does not consider every customer contact to be a complaint. Customers contact the Company for a variety of reasons, including routine service requests, account inquiries, billing questions, payment arrangements, outage information, and other informational purposes. When a customer expresses dissatisfaction, requests additional review, or raises a concern requiring further investigation or escalation, the matter may be addressed through the Company's customer escalation process. The Company does not generally distinguish between whether such escalations are characterized as inquiries or informal complaints and seeks to investigate and resolve them through the same process.

Prior Referenced Responses:

[i] OCC-136 Question:

(COMPLAINTS) In the test year, how many and what percentage of customer complaints were resolved in one call/contact?

OCC-136 Response:

The Company periodically receives complaints directly from customers through its Contact Centers. The Company addresses such complaints through its structured customer-inquiry escalation process. As a practice, the Company tracks all customer inquiries that are escalated after the initial contact with a Customer Service Representative ("CSR"), regardless of whether they are deemed to be an actionable complaint. These escalations are logged by CSRs through an internal escalation tracking mechanism that captures any customer concerns regarding specific processes, service experiences, or perceived gaps in resolution. Customer-inquiry escalation data is collected at the time of interaction, where the aim is to resolve the customer's inquiry on the first call.

The focus of an escalation ticket is to follow up and resolve the call. The Company does not distinguish between whether the customer is making an inquiry or an informal complaint. All customer inquiries are escalated with urgency, with no topic given higher priority, regardless of whether the complaint is a live transfer or call back. The Company targets a 24-hour response time to complete these escalations. However, it is important to note that not all escalations can be resolved on the first contact as they may require further research/follow up. The details captured in the escalation process feed into a monthly report used by management to confirm timely resolution of these inquiries. This report groups escalations by topic and resolution timing: on live call, within 24 hours, or after 24 hours. The Company uses this report to monitor escalations internally and to ensure that customers receive a responsive resolution.

In the Test Year, 2025, the Company resolved 92% of customer complaints received though the internal escalation process within 24 hours. The table below details the total number of customer escalations received compared to the total number resolved within the 24-hour timeframe.

Table 1: Customer Escalations through Escalations Process

Year	Total Customer Escalations	Escalated & Resolved on Live Call	Escalated & Resolved within 24 Hours	Escalated & Resolved after 24 Hours	Total Calls Answered in Contact Centers
2025	11,193	9,348	10,403	790	1,479,600

[ii] EOE-095 Question:

(COMPLAINTS) Please explain how the Company defines what is considered as a customer complaint.

EOE-095 Response:

The Company defines formal complaints primarily as customer issues or inquiries that may be escalated from various formal channels including the Public Utilities Regulatory Authority (PURA), the Attorney General, elected officials, or internal departments such as Government Affairs. Complaints escalated to leadership through channels, such as email and U.S.P.S mail are also treated as complaints. However, not all complaints and/or escalations through these channels are interpreted as representing instances in which the Company has made an error, was non-compliant or failed to meet its obligations. Customers may file complaints for a variety of reasons including but not limited to customer inquiries, misunderstandings, disagreements with company policies or dissatisfaction with outcomes based on established practices.

The Company also intakes informal complaints through its customer escalations process as described in OCC-136[i]. These escalations, including general inquiries, billing questions, payment issues, cost or usage concerns, and customer experience concerns, are generally handled in real-time during live calls. The customer escalation process serves as an avenue for customers to raise the aforementioned items, allowing the Company an opportunity to investigate and resolve matters through internal channels and escalation procedures without entering the formal complaint process as described above.

Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(ACCOUNT NUMBERS) Does the Company create a new customer account number if the customer moves to a different address?

Response:

A new *billing* account number may be established when a customer moves to a new location however, it is not always required. Whether a new billing account number is created depends on the customer's circumstances and account setup. A billing account number is used to bill the customer and maintain the customer's account history, including service, billing, and payment records.

Each *service* address is always assigned a unique service account under the customer's billing account. When a customer moves, the service address and associated service account is updated to reflect the new location.

Customers who have service at multiple addresses have the option to maintain separate billing account numbers for each service address or maintain them under one billing account number.

Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(ACCOUNT NUMBERS) Has the Company experienced issues where customers who have moved to new addresses are paying for incorrect accounts? If yes, please describe.

Response:

Customers are billed for the service address confirmed upon move-in. While the Company takes care to maintain its systems accurately, there are instances where customers may experience a mixed customer or mixed meter situation.

Mixed customers are instances where a customer moves into an incorrect site. An example is a customer moves into 1 Main St., Apt A, however, they should have moved into 1 Main St., Apt B.

Mixed Meters are instances where a customer moves into the correct site; however, meters are in the incorrect socket. An example is a customer moves into 1 Main St., Apt A, however, the meter for a different location is in that socket.

When these instances are uncovered, the Company works to ensure customer accounts are updated according to its Customer Service Policies as provided in initial filing dated July 14, 2026:

- Customer Service Policy 270.3 Investigating and Correcting Mixed Meter Conditions
- Customer Service Policy 110.3 Backbilling

Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(ACCOUNT NUMBERS) If a customer pays into an incorrect account, how will that customer be identified?

Response:

If a customer advises the Company that a payment is not reflected on their billing account, proof of payment will be required to investigate the matter.

Once the payment has been verified, the Company may transfer the payment from the incorrect billing account to the appropriate billing account to ensure the funds are properly credited.

When a mixed *meter* condition is suspected, a field investigation order is issued to confirm the situation. If the customer and CSR determine that the issue is the result of a mixed *customer* scenario, the customer will be moved to the correct address.

Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(ACCOUNT NUMBERS) If a customer pays into an incorrect account does the customer get a credit on the "correct" account once the error is discovered by the Company?

Response:

If a customer makes a payment to an incorrect billing account, the Company requires the customer to provide proof of payment. After payment verification is completed, the payment may be moved from the incorrect billing account to the customer's correct billing account to ensure the funds are credited appropriately.

If it is confirmed that the customer is impacted by a mixed meter or mixed customer scenario, the billing account is updated as outlined in the Company's Customer Service Policies provided in the initial filing dated July 14, 2026:

- Customer Service Policy 270.3 Investigating and Correcting Mixed Meter Conditions
- Customer Service Policy 110.3 Backbilling

Date Filed: October 19, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(ACCOUNT NUMBERS) How does the Company prevent incorrect accounts from being created for customers or other potential errors linked to incorrect account numbers?

Response:

When a customer establishes service, the Company verifies the customer of record and confirms the service address. The customer is then provided a billing account number, and a service account number is created to identify the location where service is being provided.

Date Filed: October 19, 2026

Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(MS24C - Misprint) Referring to Exhibit ACCT-2 (CLP-3A-1) (MS24C) CONFIDENTIAL, page 445. Why does this page have purple edits on it and who added those edits?

Response:

Referring to Exhibit ACCT-2 (CLP-3A-1) (MS24C), Outside Contractor- Vendors, Line 163, vendor C C Security Corp., invoice total $200.

As part of the invoice review process, the reviewer verifies the service locations, dates of service, and the legitimacy of the charges through confirmation with the personnel responsible for procuring the services. During this review, the reviewer may document the appropriate accounting information to ensure charges are directly assigned to the correct work order. These notations serve as additional evidence that the invoice was reviewed and verified for proper charging prior to approval.

Date Filed: October 19, 2026

Witness: John P. Dipaola-Tromba, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(MS24C - Misprint) Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C), Confidential page 81. Why does this page have purple edits on it and who added those edits?

Response:

Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C), Contractor Outside- Vendor, line 384, vendor McAllen Construction Inc, total invoice amoun of $1,970.

As part of the invoice review process, the reviewer verifies the service locations, dates of service, and the legitimacy of the charges through confirmation with the personnel responsible for procuring the services. During this review, the reviewer may document the appropriate accounting information to ensure charges are directly assigned to the correct work order. These notations serve as evidence that the invoice was reviewed and verified for proper charging prior to approval.

Date Filed: October 19, 2026

Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(MS24C - Misprint) Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C) Confidential, page 172. Why is there writing outside the boxes on the form?

Response:

Refer to Exhibit ACCT-2 (CLP-3A-8) (MS24C), Outside Contractors- vendors, line 393, vendor New England Flaggers Services, total invoice amount $2,888.

Contractors may include additional notations on their supporting documentation for their own operational or recordkeeping purposes. The presence or absence of such notations on supporting documentation is not determinative of the validity of the charges. As part of the Company's invoice review and approval process, locations, dates of service, and work order assignments are verified with the Company's internal personnel who engaged the contractor to confirm that the services were performed and that the charges are legitimate and properly charged.

Date Filed: October 19, 2026

Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(MS24C - Revisions) Referring to Exhibit ACCT-2 (CLP-3A-8) (MS24C) Confidential page 77. Why are there cross outs and other revisions on this page and who made them?

Response:

Refer to Exhibit ACCT-2 (CLP-3A-8) (MS24C), Outside contractor- Vendor, line 383, vendor M J Electric LLC, total invoice amount of $47,874.

Invoice 25170108412-1R, was a revised invoice for which discrepancies were identified and subsequently reviewed with the contractor. Upon resolution of those discrepancies, the contractor elected to make handwritten adjustments and annotations directly on the originally submitted invoice and resubmitted the revised document reflecting those changes. The contractor is not prohibited from making such handwritten revisions to an invoice. Notwithstanding the handwritten revisions to the invoice, the invoice remained subject to the Company's standard invoice review and approval process, including validation of supporting documentation, verification of charges, and confirmation that the invoiced amounts were appropriate and accurately billed.

Date Filed: October 19, 2026

Witness: David L. Gladey, John P. Dipaola-Tromba, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, pages 17-23. Did the Capital Project Authorization Procedures change since 2022?

Response:

The Capital Project Authorization Policy has not changed since 2022. There were minor changes made to the Project Authorization Policy (APS 1) on May 28, 2024. The May 28, 2024 update was solely to make certain tables, in the Project Authorization Form, excel add-ins instead of manual adding up those tables.

Date Filed: October 20, 2026

Witness: David L. Gladey, John P. Dipaola-Tromba, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, pages 27-29. The Company states that the PAF policy is applied when "the full budget and scope" of a project might not be known. Please explain how the Company makes a determination on whether a project requires a PAF or not during the preliminary stages of a project when the full budget and scope are not yet known. As part of this response, identify if there is a "high-level" or initial project costs developed for this purpose and, if so, explain how this estimate is developed.

Response:

Projects that will have a total cost of $500K or more will be required to follow the PAF process. The Company uses historical projects as a proxy to identify those projects that would meet or exceed $500K threshold for additional review and process.

Please refer to OCC-925[i] and OCC-925, Attachments 1 and 2, for the process overview and procedure documents.

Prior Referenced Response:

[i] OCC-925 Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, page 28. The Company states, "Projects less than $500,000 in total cost do not have as many opportunities for cost savings because these are smaller, short-term projects with more predictable budgets. These smaller capital projects are more likely to be routine and utilize equipment and materials previously competitively procured by the Company or ESC. This minimizes the potential for cost savings that could result from further review and analysis." Please describe the "further review and analysis" the company conducts to determine the potential for cost savings. Provide five examples of projects submitted in this proceeding where cost savings were achieved through this review and analysis step.

OCC-925 Response:

Projects with a total estimated cost of less than $500,000 are typically limited in scope and are generally associated with routine replacement of failed, damaged, or end-of-life equipment. These "break/fix" projects are usually undertaken to restore or maintain the reliability and safe operation of the electric system. Because the equipment being replaced is generally required to perform a specific function and must meet established engineering and

operational standards, there are often limited alternative solutions available. As a result, there are generally fewer opportunities for additional cost savings through further review and analysis.

For larger capital projects with estimated costs greater than $500,000, the Company conducts a more comprehensive review in accordance with the Distribution Tri State Capital Project Approval Process (Distribution Lines) or Capital Project Approval Process (Distribution Substations). As part of this process, the Company evaluates multiple alternatives and project configurations to identify the solution that best addresses the identified system need while providing the most cost-effective outcome. This review may include evaluation of different engineering designs, equipment options, system configurations, project timing considerations, and operational impacts. The selected alternative is based on an assessment of factors such as reliability, safety, operational requirements, constructability, environmental considerations, and overall project cost.

Please refer to OCC-925, Attachment 1 – Distribution Tri-State Capital Project Approval Process

Please refer to OCC-925, Attachment 2 – Capital Project Approval Process

Please refer to the following projects as examples of projects greater than $500,000 that underwent the alternatives analysis review process and achieved cost savings through the evaluation of multiple project options. The documentation for these projects is included in Exhibit CLP-ADDITIONS-4, as identified in the references below. Additionally, each line reference corresponds directly to the associated supporting folder in Exhibit CLP-ADDITIONS-6.

- CD02190 - Middle River 28M3 Load Relief: Exhibit 4 tab “Project Specifics Post 2022”, line 286
- CD02164- Norwalk 9S27 Normal overload: Exhibit 4 tab “Project Specifics Post 2022”, line 281
- CD02577 - Amazon EV Chargers, Victoria Dr, Monroe: Exhibit 4 tab “Project Specifics Post 2022”, line 374
- CD02153 - Stone Bridge Commons New Service: Exhibit 4 tab “Project Specifics Post 2022”, line 278
- CS00577 - Rockville 14W-6X Transformer Voltage Change: Exhibit 4 tab “Project Specifics Post 2022”, line 416

Date Filed: October 20, 2026

Witness: David L. Gladey, John P. Dipaola-Tromba, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, page 12. Please define the term "flexibility in the budget"; explain what determines whether a project has budget flexibility or not; and identify the components (i.e. project cost categories) of a project budget which are flexible and which are inflexible.

Response:

The term “flexibility in the budget” is a reference to the overall capital budget, not the budget for a specific project. The term refers to the ability to defer, accelerate, or reprioritize planned capital spending within a given budget period in response to changing system conditions, emerging operational needs, or unforeseen project requirements. Budget flexibility is an important component of managing a large capital portfolio and enables the Company to efficiently allocate capital to projects that provide the greatest near-term benefit to customers and system operations.

Whether a specific project has flexibility in relation to the *overall budget* depends primarily on the urgency of the underlying need, regulatory or compliance requirements, customer commitments, safety considerations, and the potential system impacts associated with delaying the work. Projects that address immediate safety concerns, mandated compliance requirements, emergent reliability issues, customer-driven obligations, or equipment failures generally have limited or no budget flexibility because delays could result in unacceptable operational, safety, or customer impacts. In contrast, projects addressing aging infrastructure that remain in serviceable condition may have greater flexibility because the assets can continue to operate safely and reliably for a period beyond the originally planned replacement date.

For aging infrastructure replacement projects, budget flexibility typically exists when asset condition, engineering assessments, operational history and system performance indicate that the asset can remain in service without creating an immediate reliability, safety, or compliance concern. In these situations, The Company may defer a planned replacement project by one or more years with limited near-term impact on customer reliability while continuing to monitor the asset through its normal maintenance and inspection programs.

Budget categories that are generally considered more flexible include planned construction expenditures associated with asset replacement programs, such as labor, materials, equipment, and

contractor costs for projects that have not yet commenced construction or where construction can be paused without creating risk to the distribution system and can be rescheduled based on emergent priorities.

The ability to defer certain aging infrastructure replacement projects provides an important mechanism for managing capital expenditures within the overall portfolio. When unforeseen conditions arise, such as unexpected equipment failures, storm-related damage, deteriorated assets identified through inspections, or other emergent reliability needs, funding associated with projects that can be safely deferred may be reallocated to address those higher-priority needs. This approach allows the Company to respond promptly to emergent system conditions while continuing to maintain safe and reliable service. Deferred replacement projects remain within the long-term capital plan and are reevaluated in subsequent planning cycles to ensure that asset condition and system risk remain acceptable before replacement is further postponed.

Accordingly, budget flexibility does not reflect the elimination of planned infrastructure investments, but rather the Company's ability to optimize the timing of certain replacement projects whose deferral is not expected to have an immediate impact on system reliability, while ensuring sufficient funding is available to address unforeseen conditions that require immediate corrective action.

Date Filed: October 20, 2026

Witness: David L. Gladey, John P. Dipaola-Tromba, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, page 28. The Company states, "Projects less than $500,000 in total cost do not have as many opportunities for cost savings because these are smaller, short-term projects with more predictable budgets. These smaller capital projects are more likely to be routine and utilize equipment and materials previously competitively procured by the Company or ESC. This minimizes the potential for cost savings that could result from further review and analysis." Please describe the "further review and analysis" the company conducts to determine the potential for cost savings. Provide five examples of projects submitted in this proceeding where cost savings were achieved through this review and analysis step.

Response:

Projects with a total estimated cost of less than $500,000 are typically limited in scope and are generally associated with routine replacement of failed, damaged, or end-of-life equipment. These "break/fix" projects are usually undertaken to restore or maintain the reliability and safe operation of the electric system. Because the equipment being replaced is generally required to perform a specific function and must meet established engineering and operational standards, there are often limited alternative solutions available. As a result, there are generally fewer opportunities for additional cost savings through further review and analysis.

For larger capital projects with estimated costs greater than $500,000, the Company conducts a more comprehensive review in accordance with the Distribution Tri State Capital Project Approval Process (Distribution Lines) or Capital Project Approval Process (Distribution Substations). As part of this process, the Company evaluates multiple alternatives and project configurations to identify the solution that best addresses the identified system need while providing the most cost-effective outcome. This review may include evaluation of different engineering designs, equipment options, system configurations, project timing considerations, and operational impacts. The selected alternative is based on an assessment of factors such as reliability, safety, operational requirements, constructability, environmental considerations, and overall project cost.

Please refer to OCC-925, Attachment 1 – Distribution Tri-State Capital Project Approval Process

Please refer to OCC-925, Attachment 2 – Capital Project Approval Process

Please refer to the following projects as examples of projects greater than $500,000 that underwent the alternatives analysis review process and achieved cost savings through the evaluation of multiple project options. The documentation for these projects is included in Exhibit CLP-ADDITIONS-4, as identified in the references below. Additionally, each line reference corresponds directly to the associated supporting folder in Exhibit CLP-ADDITIONS-6.

- CD02190 - Middle River 28M3 Load Relief: Exhibit 4 tab "Project Specifics Post 2022", line 286

- CD02164- Norwalk 9S27 Normal overload: Exhibit 4 tab "Project Specifics Post 2022", line 281

- CD02577 - Amazon EV Chargers, Victoria Dr, Monroe: Exhibit 4 tab "Project Specifics Post 2022", line 374

- CD02153 - Stone Bridge Commons New Service: Exhibit 4 tab "Project Specifics Post 2022", line 278

- CS00577 - Rockville 14W-6X Transformer Voltage Change: Exhibit 4 tab "Project Specifics Post 2022", line 416

Date Filed: October 20, 2026

Witness: David L. Gladey, John P. Dipaola-Tromba, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, page 29. Projects that are "repetitive, numerous, and routine" are "authorized via annual program authorizations, rather than on an individual project basis. " Why is this the case?

Response:

Annual programs include many similar, small, and/or routine capital jobs performed over the course of a year for which one PAF is prepared each year. These individual workorders are less than $500,000. In many cases, these projects are emergent and have limited scope and as a result are not susceptible to pre-planning or pre-authorization given time imperatives. Given the size and routine nature of these projects, projects under annual programs do not need or warrant a more complex and resource-consuming project management process. The amounts are generally based on historical spending levels, although amounts can vary from year to year. If any individual work order exceeded $500,000, a specific project would be created.

Date Filed: October 20, 2026

Witness: David L. Gladey, John P. Dipaola-Tromba, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(Capital Projects) Referring to Exhibit CLP-Additions-1, page 28. The Company states, "Larger projects with more than $500,000 in total cost will have more prospects for cost savings because they often involve multiple phases over longer periods of time, which affords the Company the opportunity to reevaluate and minimize expenses in the event of a change in scope or budget." It is understood that the phasing of a project breaks up a project scope into multiple components or sub projects. The overall scope of a project -- whether it is phrased or not -- does not change. It is not clear here from the panels' testimony how the phasing of a project results in greater "prospects" for cost savings. One possible interpretation of what the panel is saying here is that larger projects have "flexible budgets" because the phasing allows for scope and budget for the project to be shifted across different budgeting periods. In other words, phasing does not necessarily lower the project costs but the flexibility offered by phasing a project is that it allows for the company to only have to account for part of a project when developing the annual capital budgets.

a. Confirm whether this is a correct interpretation.
b. If the Company believes it is not a correct interpretation explain why not and elaborate on how exactly phasing allows for the potential for cost savings.

Response:

a. No, this is not a correct interpretation of the Company's statements or practices. This interpretation is conflating separate concepts.

b. First, the question addresses the opportunities for savings on smaller and larger projects with $500,000 as the dividing line. In that regard, the Company's experience is that there is a difference between the cost savings opportunities available on larger projects (over $500,000) and smaller projects (under $500,000). As discussed in the response to OCC-926[i], smaller projects are projects that are done frequently and would include, for example, the replacement of two poles in an area of the system with overhead circuits attached. The Company does a lot of these types of jobs and the opportunities for cost savings are not generally found on an individual job site, but rather would be found only on a more aggregate basis, such as in relation to the cost of materials (i.e., poles), applicable across many projects. The Company does not buy poles in pairs, so that particular savings could be achieved on that job in relation to the procurement of two poles. Similarly, the labor is

what it is and will not be different one job to another, unless there are specific circumstances that cause the cost to differ materially.

With larger, more complex projects, there are more opportunities to identify and achieve cost savings through all of the various "gates" that the project travels in planning, design and construction. Please refer to the Company's response to OCC-925[ii] for examples. On larger projects, materials may be procured specifically for the respective project, or there may be differences that engineering can identify for cost savings, or different types of labor that can be used, or other opportunities.

Second, the question asserts that "the phasing of a projects breaks up a project scope into multiple components or sub projects" and suggests that the Company is claiming that this is a "cost savings." However, this term "phasing" is not a term used by the Company. The term "flexible" was used by the Company to refer to the overall budgeting process described in response to OCC-924[iii], where the Company may set aside an ongoing project to accommodate an emergent project, in order to stay within the *overall* annual budget. This is not a cost-saving strategy, it is a budget maintenance strategy, as described in that response.

Prior Referenced Response:

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[i] OCC-926 Question:
(Capital Projects) Referring to Exhibit CLP-Additions-1, page 29. Projects that are "repetitive, numerous, and routine" are "authorized via annual program authorizations, rather than on an individual project basis. " Why is this the case?

OCC-926 Response:
Annual programs include many similar, small, and/or routine capital jobs performed over the course of a year for which one PAF is prepared each year. These individual workorders are less than $500,000. In many cases, these projects are emergent and have limited scope and as a result are not susceptible to pre-planning or pre-authorization given time imperatives. Given the size and routine nature of these projects, projects under annual programs do not need or warrant a more complex and resource-consuming project management process. The amounts are generally based on historical spending levels, although amounts can vary from year to year. If any individual work order exceeded $500,000, a specific project would be created.

[ii] OCC-925 Question:
(Capital Projects) Referring to Exhibit CLP-Additions-1, page 28. The Company states, "Projects less than $500,000 in total cost do not have as many opportunities for cost savings because these are smaller, short-term projects with more predictable budgets. These smaller capital projects are more likely to be routine and utilize equipment and materials previously competitively procured by the Company or ESC. This minimizes the potential for cost savings that could result from further review and analysis." Please describe the "further review and analysis" the company conducts to determine the potential for cost savings. Provide five examples of projects submitted in this proceeding where cost savings were achieved through this review and analysis step.

OCC-925 Response:
Projects with a total estimated cost of less than $500,000 are typically limited in scope and are generally associated with routine replacement of failed, damaged, or end-of-life equipment. These "break/fix" projects are usually undertaken to restore or maintain the reliability and safe operation of the electric system. Because the equipment being replaced is generally required to perform a specific function and must meet established engineering and operational standards, there are often limited alternative solutions available. As a result, there are generally fewer opportunities for additional cost savings through further review and analysis.

For larger capital projects with estimated costs greater than $500,000, the Company conducts a more comprehensive review in accordance with the Distribution Tri State Capital Project Approval Process (Distribution Lines) or Capital Project Approval Process (Distribution Substations). As part of this process, the Company evaluates multiple alternatives and project configurations to identify the solution that best addresses the identified system need while providing the most cost-effective outcome. This review may include evaluation of different engineering designs, equipment options, system configurations, project timing considerations, and operational impacts. The selected alternative is based on an assessment of factors such as reliability, safety, operational requirements, constructability, environmental considerations, and overall project cost.

Please refer to OCC-925, Attachment 1 – Distribution Tri-State Capital Project Approval Process
Please refer to OCC-925, Attachment 2 – Capital Project Approval Process

See the following projects as examples of projects greater than $500,000 that underwent the alternatives analysis review process and achieved cost savings through the evaluation of multiple project options. Please note that these projects are also included in Exhibit CLP-ADDITIONS-4, as identified in the references below. Additionally, each line reference corresponds directly to the associated supporting folder in Exhibit CLP-ADDITIONS-6.

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- CD02164- Norwalk 9S27 Normal overload: Exhibit 4 tab “Project Specifics Post 2022”, line 281
- CD02577 - Amazon EV Chargers, Victoria Dr, Monroe: Exhibit 4 tab “Project Specifics Post 2022”, line 374
- CD02153 - Stone Bridge Commons New Service: Exhibit 4 tab “Project Specifics Post 2022”, line 278
- CS00577 - Rockville 14W-6X Transformer Voltage Change: Exhibit 4 tab “Project Specifics Post 2022”, line 416

[iii] OCC-924 Question:
(Capital Projects) Referring to Exhibit CLP-Additions-1, page 12. Please define the term "flexibility in the budget"; explain what determines whether a project has budget flexibility or not; and identify the components (i.e. project cost categories) of a project budget which are flexible and which are inflexible.

OCC-924 Response:
The term “flexibility in the budget” is a reference to the overall capital budget, not the budget for a specific project. The term refers to the ability to defer, accelerate, or reprioritize planned capital spending within a given budget period in response to changing system conditions, emerging operational needs, or unforeseen project requirements. Budget flexibility is an important component of managing a large capital portfolio and enables the Company to efficiently allocate capital to projects that provide the greatest near-term benefit to customers and system operations.

Whether a specific project has flexibility in relation to the *overall budget* depends primarily on the urgency of the underlying need, regulatory or compliance requirements, customer commitments, safety considerations, and the potential system impacts associated with delaying the work. Projects that address immediate safety concerns, mandated compliance requirements, emergent reliability issues, customer-driven obligations, or equipment failures

generally have limited or no budget flexibility because delays could result in unacceptable operational, safety, or customer impacts. In contrast, projects addressing aging infrastructure that remain in serviceable condition may have greater flexibility because the assets can continue to operate safely and reliably for a period beyond the originally planned replacement date.

For aging infrastructure replacement projects, budget flexibility typically exists when asset condition, engineering assessments, operational history and system performance indicate that the asset can remain in service without creating an immediate reliability, safety, or compliance concern. In these situations, The Company may defer a planned replacement project by one or more years with limited near-term impact on customer reliability while continuing to monitor the asset through its normal maintenance and inspection programs.

Budget categories that are generally considered more flexible include planned construction expenditures associated with asset replacement programs, such as labor, materials, equipment, and contractor costs for projects that have not yet commenced construction or where construction can be paused without creating risk to the distribution system and can be rescheduled based on emergent priorities.

The ability to defer certain aging infrastructure replacement projects provides an important mechanism for managing capital expenditures within the overall portfolio. When unforeseen conditions arise, such as unexpected equipment failures, storm-related damage, deteriorated assets identified through inspections, or other emergent reliability needs, funding associated with projects that can be safely deferred may be reallocated to address those higher-priority needs. This approach allows the Company to respond promptly to emergent system conditions while continuing to maintain safe and reliable service. Deferred replacement projects remain within the long-term capital plan and are reevaluated in subsequent planning cycles to ensure that asset condition and system risk remain acceptable before replacement is further postponed.

Accordingly, budget flexibility does not reflect the elimination of planned infrastructure investments, but rather the Company's ability to optimize the timing of certain replacement projects whose deferral is not expected to have an immediate impact on system reliability, while ensuring sufficient funding is available to address unforeseen conditions that require immediate corrective action.

Date Filed: October 20, 2026

Witness: Lavelle A. Freeman, Edward A. Davis, Juan F. Martinez, Gerhard Walker and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 31, which states that the proposed EDR "produces system-wide benefits by improving utilization, enhancing fixed cost recover, and placing downward pressure on rates."

a. Please explain whether and how the rate schedules applicable to EDR customers (Rate 57 and Rate 58) provide incentives for customers to shift load away from system or local peak hours. If not, why not?
b. Please provide the capacity headroom on the Company's system and identify the date and hour of the system peak for the last 3 years.
c. Please provide the capacity headroom for each of the Company's substation, along with the date and hour of peak at each substation for the last 3 years.

Response:

a. The structures and design of rates for each component of service under these schedules reflect the type of cost and charge associated with the service provided. Distribution demand charges are designed to meet these customers' system demand requirements and to be more efficient by recovering fixed local and system costs through customer charges, which are further set on a tiered basis depending on customer's level of demand and local capacity requirements. Charges for transmission and NBFMCC components of service are designed to recover the cost of providing these services on a peak period demand basis, which provides a price signal to efficiently manage load during peak hours and potentially reduce or shift load away from peak hours. Generation service for these customers is provided through Last Resort Service, which is priced on a time-of-day basis which provides volumetric-based (i.e., per kWh) pricing which may also encourage efficient use of power and provide an incentive to shift load away from peak hours.

b. Please refer to OCC-928, Attachment 1, for headroom capacity of all bulk substations. The last 3 years available are 2023, 2024, and 2025. The last row in the excel worksheet of Attachment 1 calculates the total non-coincident headroom capacity. These values can be used to identify capacity headroom on the Company's system but they cannot be simply added up to identify a total system headroom capacity but rather need to be understood as available headroom at a specific asset. It must also be understood that assets upstream, or

downstream may be more limiting than the station headroom itself. The total headroom capacity is not used to plan system needs but may be used as a trend to identify the overall capacity available from year to year. Headroom capacity for a specific location can be seen on the Company's hosting capacity map (Eversource CT Grid Connection Navigator). It is assumed that the question is asking for distribution loads, not including transmission loads. If so the dates and hours with the highest coincident distribution loads across the substations for the last 3 years have been:

i. 9/17/2023: 5 pm
ii. 7/16/2024: 6 pm
iii. 7/29/2025: 6 pm

c. Please refer to OCC-928, Attachment 1, for headroom capacity of all bulk substations. The last 3 years available are 2023, 2024, and 2025. Peak load data for 2026 has not been finalized to calculate headroom capacity.

Date Filed: October 19, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26. Please explain the standards the Company will use to determine that a customer's project provides sufficient economic value, including job creation and capital investment, to qualify for the EDR.

Response:

The Company anticipates a written commitment and demonstrated achievement of added jobs and capital investment within the Company's service area, commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR. The Company is also reviewing the requirements and documentation set forth as part of UI's current EDR program, pursuant to UI's rate case in Docket No. 28-08-08. Details of these and other standards are yet to be developed.

Date Filed: October 19, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26. Please explain the standards the Company would use to determine that a customer's project sufficiently supports regulatory objectives to qualify for the EDR. Please also identify the relevant "regulatory objectives."

Response:

In addition to customer-side standards such as those highlighted in response to OCC-929[i], the regulatory objectives under the EDR would include meeting the minimum new or incremental demand thresholds and setting discounted rates at levels that exceed marginal cost of providing service while providing a contribution to fixed costs of providing service and without shifting costs to other customers. The requirements set forth as part of the decision and EDR implemented pursuant to UI's rate case in PURA Docket No. 28-08-08 provide another basis for regulatory objective standards applicable to the Eversource EDR.

Prior Referenced Response:

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[i] OCC-929 Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26. Please explain the standards the Company will use to determine that a customer's project provides sufficient economic value, including job creation and capital investment, to qualify for the EDR.

OCC-929 Response:

The Company anticipates a written commitment and demonstrated achievement of added jobs and capital investment within the Company's service area, commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR. The Company is also reviewing the requirements and documentation set forth as part of UI's current EDR program, pursuant to UI's rate case in Docket No. 28-08-08. Details of these and other standards are yet to be developed.

Date Filed: October 19, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 26-27. Please explain what information a customer will be required to submit to demonstrate that "new load or expanded operations would not occur, or would be materially altered, absent the availability of the EDR." Will applicants be required to provide pricing offers from other utilities/jurisdictions? If not, why not?

Response:
An applicant will be required to attest and demonstrate that receiving a discount under the EDR is a decisive factor in their decision to add new or incremental load during the term of service under the EDR. An explanation of the reason and characteristics of such new or incremental load, and of why an EDR discount is needed as a prerequisite for siting or expansion of load in the Company's service area is also required.

Date Filed: October 19, 2026

Witness: Edward A. Davis, Steven Lamontagne and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 29.

a. Please explain what equipment is included in the "interconnection, system upgrade, or make-ready costs" for which EDR customers would be responsible (e.g., substations, transformers, conductors, etc.).
b. If upgrades to shared infrastructure, such as substations, are required, explain how the costs of the upgrades are recovered.

Response:

a. Customers would be responsible for all costs associated with the installation of a new service pursuant to the Company's new business policies. These costs are determined when such applications are made to the Company and would vary depending on the site conditions and work required for each location. Discounted revenues contemplated under the term of an EDR would be considered in the context of any CIAC or similar evaluation for a prospective EDR applicant.

b. Such upgrades and the recovery of costs would be considered pursuant to the Company's new business policy guidelines and any other considerations at the time of application for service.

Date Filed: October 19, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(ECONOMIC DEVELOPMENT RATE) Refer to the Company's response to OCC-458. Explain the factors that will be considered in negotiations with each EDR customer (e.g., potential system benefits, economic development benefits) and the relative weight of each factor for determining the customer's discount level.

a. Did the Company consider providing the same discount level for all EDR customers? If so, why did the Company rule out this option? If not, why not?

Response:

The Company considered a set of fixed, declining factors, but did not elect to propose this pathway without additional data from specific use cases. As a general framework for any negotiation, the Company considers discounts to distribution rates equating to 25% in year 1 with 5% decrements in each of the 4 subsequent, sequential years, terminating upon completion of the 5-year period, to be a reasonable initial schedule. Relative to this schedule, both the discounts (higher or lower) and the term (5 years is the maximum) could potentially be adjusted, with consideration of both the aforementioned regulatory objectives and the need to achieve revenue sufficiency pursuant to factors discussed in the Company's response to OCC-932[i], assuring no shifting of costs to other customers. In turn, further discount levels may be considered commensurate with a demonstrated positive system benefit (e.g., contribution to fixed costs while remaining above marginal costs).

Prior Referenced Response

[i] OCC-932 Question:

(ECONOMIC DEVELOPMENT RATE) Refer to Exh. CLP-RATES-1, at 29.
a. Please explain what equipment is included in the "interconnection, system upgrade, or make-ready costs" for which EDR customers would be responsible (e.g., substations, transformers, conductors, etc.).
b. If upgrades to shared infrastructure, such as substations, are required, explain how the costs of the upgrades are recovered.

OCC-932 Response:

a. Customers would be responsible for all costs associated with the installation of a new service pursuant to The Company's new business policies. These costs are determined when such applications are made to The Company and would vary depending on the site conditions and work required for each location. Discounted revenues contemplated under the term of an EDR would be considered in the context of any CIAC or similar evaluation for a prospective EDR applicant.

b. Such upgrades and the recovery of costs would be considered pursuant to The Company's new business policy guidelines and any other considerations at the time of application for service.