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Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Undocketed Correspondence – Follow-Up to January 28, 2026 Technical Meeting on Procedural, Filing and Process Adjustments for PURA Proceedings

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") submits this undocketed correspondence requesting that the Public Utilities Regulatory Authority ("PURA") consider and grant approval of certain modifications to the filing procedures traditionally followed for rate applications. This correspondence is a follow-up to the productive technical meeting that PURA convened on January 28, 2026, to identify potential adjustments to procedural and filing requirements in order to promote administrative efficiency.

1. Paper Copies of Rate Case Applications.

In the 2024-2025 Yankee Gas rate case in Docket No. 24-12-01, the Notice of Proceeding directed the applicant to provide 15 hard copies of the application and supporting materials to PURA as part of the initial filing, as well as two hard copies to the Office of Consumer Counsel ("OCC") and three hard copies to the Office of Education, Outreach, and Enforcement ("EOE"), except that only two hard copies were required for exhibits totaling 100 pages or more.[1]

In the more recent 2025-2026 Aquarion rate case in Docket No. 25-12-12, the Notice of Proceeding directed the applicant to provide 10 hard copies of the application and supporting materials to PURA, and two hard copies to OCC, except that only two hard copies were required for exhibits totaling 100 pages or more.[2] The Aquarion rate case Notice also stated that "[f]or the Application . . . to be considered complete, and for the statutory timeline to commence, the Authority must be in receipt of the ten (10) hard copies in addition to the electronic submittal. Conn. Agencies Regs. § 16-1-14(g)(4)."

The Company's research indicates that Section 16-1-14(g)(4) of PURA's regulations does not require 10 hard copies of the application and supporting materials. Instead, it states in relevant part that "[t]o file a document, the filer shall submit the original document along with one

[1] Docket No. 24-12-01, Notice of Proceeding dated October 22, 2024, at 4.

[2] Docket No. 25-12-12, Notice of Proceeding dated January 23, 2026, at 4.

electronic copy and eight paper copies of such document, except . . . (4) as otherwise required by the Authority."

The Company appreciates that hard copies of rate-amendment filings are both necessary and helpful to PURA due to the complexities and highly technical nature of the materials produced for PURA commissioners and staff as part of a rate amendment. Accordingly, the Company looks forward to accommodating any requests for production of hard copies that will be useful to PURA, OCC, EOE or other parties and intervenors. However, producing a large number of paper copies of the rate-case application and supporting exhibits involves the printing of hundreds of thousands of pages of paper in advance of the rate filing, when the Company is endeavoring to take its final steps to produce a quality, complete filing that meets all of PURA's requirements and expectations. In addition, it may be economical to pare down paper-based applications in favor of digital processes, for reasons of environmental impact, efficiency and cost-control.

For these reasons – and because Section 16-1-14(g)(4) allows PURA to waive (or otherwise implement) this production requirement – the Company requests that PURA consider modifying its traditional procedure to require a complete electronic copy of the application and supporting materials to be timely filed on the applicable due date, and thereafter, any paper copies requested by PURA, OCC or another party or participant could be submitted within one week of the electronic filing. This modified approach would allow the Company to focus on the electronic production first, with the paper copies as a follow up and would also provide PURA, OCC or other participants with the opportunity to calibrate the precise number of copies they need. The final objective would be to provide hard copies in an economical and efficient manner.

2. Filing Bulk Documentation in Rate Cases.

Regarding the electronic filing of the application and supporting materials, for efficiency reasons the Company requests that PURA consider allowing the filing of high-volume documentation, such as capital project documentation or invoice documentation (i.e., exhibits/attachments larger than 500 pages) through a SharePoint site and/or on a flash drive with organized files in folders versus combining high-volume electronic files into a bulk PDF. PURA, the Company and docket participants experienced in CL&P's recent storm cost prudence proceeding in Docket No. 25-12-13 that filing high-volume documentation in PDF format creates a challenge for the agency and all docket participants because it often takes a substantial amount of time to open such files for reference at hearing, or doing so causes the user's computer to crash because the files are so large. During Docket No. 25-12-13, there were delays in the hearing room when witnesses and cross-examiners were attempting to open such large volume PDF files.[3] The Company proposes to submit such high-volume documentation similarly to how it filed information in discovery responses to RSR-099 and RSR-106 in Docket No. 25-12-13.[4]

[3] Docket No. 25-12-13, Tr. 3/24/26, at 69; Tr. 3/25/26, at 12-13; Tr. 4/1/26, at 53.

[4] In Docket No. 25-12-13, in response to RSR-099 and RSR-106, among others, the Company submitted, via SharePoint, Zip Folders with folders and files within clearly structured and labeled correlating to the information requested. The information stored in the Zip Folders was easy to follow/review as it was stored in a manner that followed a lead sheet that was provided and clearly explained (e.g., see RSR-106, Attachments 1, 2 and 3 CONFIDENTIAL).

Using this Share Point and/or flash drive alternative is more efficient and eliminates the risk of causing information-technology challenges and delays for those who are using these large PDF files, especially when they are attempting to do so during a live hearing process. For these reasons, the Company requests that PURA authorize such large volume files to be submitted through a SharePoint site and/or on a flash drive with files in folders.

3. Redactions

Redactions of confidential, high-volume documents is typically not feasible without significant cost and an extraordinary, manual work effort. To promote efficiency, while assuring public notice, the Company proposes that it would not be required to generate a public redacted copy of any high-volume confidential documentation (i.e., exhibits/attachments larger than 500 pages). Instead, consistent with past practice, a complete unredacted copy of high-volume documents would be timely filed in a confidential format so that PURA staff, OCC, EOE and all other parties and intervenors that have signed a non-disclosure agreement can promptly access those documents. To satisfy the public interest, the Company will prepare and submit a detailed table of contents for the confidential exhibit/attachment that could be released to the public for notice and reference purposes.

In addition, the Company proposes that if any party or intervenor requests a public redacted version of a specific portion of a high volume confidential document for a valid reason such as the need to show that document on a screen in the hearing room during cross examination, the Company will work with that party in advance in good faith to accommodate such requests.

For these reasons, the Company requests that high volume confidential documents only need to be filed in confidential format electronically, but if a party or intervenor requests a public redacted version for a valid reason such as to facilitate cross-examination in the hearing room, the Company will work in good faith with the requestor to attempt to accommodate their request.

4. Other Potential Procedural Ideas

The Company's expectation is that PURA, OCC, EOE or other potential participants in a CL&P rate filing may have their own ideas or thoughts on procedures that CL&P could follow to better enable their participation from a logistical or administrative standpoint. If so, the Company is amenable to participating in an undocketed technical meeting to have a discussion on the logistics and approach for CL&P's rate filing and whether the Company could make adjustments to better facilitate the structure and/or delivery of the rate filing at the time it is filed.

Eversource greatly appreciates PURA's consideration of the issues raised herein and will coordinate and collaborate in any way possible on this filing.

Very truly yours,

Vincent P. Pace

Vincent P. Pace
Daniel T. Crisp
Lauren H. Bidra
On behalf of CL&P d/b/a Eversource Energy

cc: Office of the Attorney General
Office of Consumer Counsel
Department of Energy & Environmental Protection
Office of Education, Outreach & Enforcement
United Illuminating Company
Connecticut Water Company