Date Filed: October 21, 2026

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

Question:

(Follow-up to ALLCO-059, and ALLCO-060, in light of NECTA-057 — project-level tracking of estimated versus actual charges.) In ALLCO-059, and ALLCO-060, the Company declined to provide a project-level schedule of interconnection charges estimated, billed, reconciled, and refunded, stating that it "does not track or maintain information on interconnections in a format that is commercially reasonable for the Company to collect and provide." In NECTA-057, filed September 23, 2026, the Company produced, for third-party pole attachers, a workbook covering May 11, 2022 through June 30, 2026 that lists for each application the application and survey fees, the "Make-Ready Estimate Amount," the "True-Up Cost," the actual charges billed to the attacher, the dates of submission and survey, the pole, the town, and the engineering comments, and stated that it "has access to available data" in that form. (a) Identify the system(s) from which NECTA-057, Attachment 1, was generated and state whether interconnection applications, cost estimates, customer payments, final accountings, and refunds are recorded in the same or a comparable system (including PowerClerk, the work-order system, and Account 252500). (b) State each respect in which producing, for distributed generation and qualifying facility interconnections, a workbook with the same fields — application identifier, estimate amount, amounts paid, actual cost, true-up or refund amount, and dates — is less "commercially reasonable" than producing NECTA-057, Attachment 1, and the hours and cost the Company estimates each would require. (c) Produce that workbook for all Level 2 and Level 3 interconnection applications that reached a cost estimate from January 1, 2018 through June 30, 2026, or, if the Company maintains that it cannot, produce it for the Allco Applications. (d) State whether the Company began maintaining detailed records of billable and non-billable make-ready costs in response to a decision of the Authority (as stated in NECTA-054(a)), identify that decision, and state whether any decision, order, or internal policy requires comparable record-keeping for interconnection charges.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Without waiving said objections, Eversource states as follows:

a. Alden One is the system of record that PURA has mandated for pole attachments, and applicable data from Alden One was used to produce NECTA-057, Attachment 1. Interconnection applications, cost estimates, customer payments, final accountings and refunds are not maintained or tracked in Alden One.

b. PowerClerk captures information relative to the process of interconnecting generation and storage to the Eversource infrastructure. The Company is unable to provide an estimate, within the requested timeframe to submit a response, of the cost and hours for an IT project to provide functionality in PowerClerk that is similar to functionality in AldenOne, which is a separate system used for a different purpose. If such functionality is desired, the Company suggests raising this topic at a monthly meeting of the Interconnection Working Group.

c. Please refer to the Company's response to ALLCO-119[i], subparts (a) and (b) for the total number of applications.

d. Eversource began maintaining detailed records of both billable and non-billable make ready cost for third party applications consistent with the requirements of the Docket 19-01-52RE01 Decision, May 11, 2022. There is no comparable PURA decision or order for the recordkeeping of interconnection charges.

Prior Referenced Response:

[i] ALLCO-119 Question:

(Follow-up to ALLCO-057 — Level 2 and Level 3 applications.) The Company's response to ALLCO-057, confined its figures to Level 1 applications and defined "completed or otherwise closed" as applications that received Permission to Operate. ALLCO-057, asked for all Connecticut DG interconnection applications. For each calendar year 2020 through 2025, separately for Level 2 applications, Level 3 applications, and any other category of application that is not Level 1, state: (a) the number and aggregate MW AC of applications received; (b) the number that received Permission to Operate; (c) the number withdrawn; (d) the number denied, rejected, or cancelled by the Company; (e) the number pending at December 31 of that year; (f) the number and aggregate MW AC that required electric power system modifications or upgrades; and (g) item (f) as a percentage of items (a), (b), and (e). Provide

the schedule in native Excel format derived from PowerClerk, and state why the Company's response to ALLCO-057, omitted Level 2 and Level 3 applications.

ALLCO-119 Response:

Eversource has only Level 1 and Level 2 applications. The reporting included in this response is for Level 2. The Level 1 applications were previously reported in the Company's response to ALLCO-057.

a.

Level 2 (≤2 MW)		*Level Type = Level 2 and System Size ≤ 2 MW*			
Calendar Year	**(a) # Applications Received**	**(a) Aggregate MW AC Received**	**(b) # Received Permission to Operate**	**(c) # Withdrawn**	**(e) # Pending at Dec 31**
2020	574	207.3	273	121	581
2021	626	117.8	398	150	659
2022	314	110.0	309	96	568
2023	401	92.4	195	84	693
2024	479	138.9	279	165	725
2025	436	91.3	395	72	694
2020–2025	**2,830**	**757.8**	**1,849**	**688**	

b.

Over 2 MW		*Level Type = Level 2 and System Size > 2 MW*			
Calendar Year	**(a) # Applications Received**	**(a) Aggregate MW AC Received**	**(b) # Received Permission to Operate**	**(c) # Withdrawn**	**(e) # Pending at Dec 31**
2020	17	140.0	2	7	36
2021	31	146.0	2	12	53
2022	37	276.4	2	19	69
2023	46	281.2	1	27	87
2024	36	184.9	7	24	92
2025	35	158.7	6	5	116
2020–2025	**202**	**1,187.3**	**20**	**94**	

c. Please refer to the Company's responses to subparts (a) and (b) above.

d. The Company does not deny, reject or cancel projects. The Company notifies the customer/developer of action needed, including investments, for the project to move forward. The customer/developer decides if the actions are a viable option for the project.

e. Please refer to the Company's responses to subparts (a) and (b) above.

f. This data is not tracked in Power Clerk.

g. The percentages cannot be calculated.

The Company notes that the Company's response to ALLCO-057, which was a follow-up to the Company's response to ALLCO-016[ii], regarding the proposed Level 1 DER Interconnection Processing metric, requested additional information to what the Company provided in ALLCO-016, Attachment 1. ALLCO-057, did not request that Eversource provide information on Level 2 applications, which is irrelevant to the proposed metric. There are no Level 3 applications.