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**
		:	**AUGUST 12, 2026**

THE OFFICE OF CONSUMER COUNSEL'S FIFTH 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 **August 26, 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-366 through OCC-394 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-366. Audit Fees. Refer to Exhibit CLP-REVREQ-1, page 68 lines 10-13.

a. Provide the calculations for the 2026 accrued audit engagement fees.
b. Provide the 2026 year-to-date actual audit fees.
c. Provide invoices, engagement letters, supporting the interim period and rate year amount.

OCC-367. Audit Fees. Refer to WP C-3.2. Provide the calculations showing how the Rate Year 1 Adjustment was derived.

OCC-368. Bank Fees and Debt Service Charges. Refer to WP C-3.3. Provide the actual amounts in the same format for each of the years 2021, 2022, 2023, 2024, 2025 and

the rate year including the amounts of rating agency fees that are mentioned on Exhibit CLP-REVREQ-1, page 69, lines 11-12.

OCC-369. Employee Variable Compensation. Refer to Schedule C-3.6. Provide the amount included in the rate year 1 related to financial goals.

OCC-370. Executive Variable Compensation. Refer to Schedule C-3.7. Provide the amount included in the rate year 1 related to financial goals.

OCC-371. Computer Services. Refer to WP C-3.8.

a. Provide the actual amounts in the same format for each of the years 2021, 2022, 2023, 2024, 2025 and the rate year.
b. Confirm that the Rate Year 1 adjustments are for inflation only.

OCC-372. Employee Benefits. Refer to Exhibit CLP-REVREQ-3 line 27. Explain why the 2022 CY charge was negative.

OCC-373. ESC Capital Funding. to Exhibit CLP-REVREQ-1, page 83 lines 1-21 through page 84 lines 1-2 and lines 11-15.

a. Explain why the Company replaced the weighted average of Eversource operating companies ROE with the Company's proposed ROE in this case.
b. Confirm that the ESC charge billed to CL&P in the rate year will be based on the weighted average of Eversource operating companies ROE.

OCC-374. Refer to Settlement Agreement Attachment 3 in Docket No. 17-10-46 and Exhibit CLP-REVREQ-3 in the current case. Provide explanations for the variances in spending between authorized and actual:

a. Compensation Payroll Expense. Explain the reason why the Company spent less than the 2020 amount authorized in 2021, 2022 and 2023.
b. Facilities Maintenance. Explain the reason why the Company spent less than the 2020 amount authorized in 2021, 2022, 2023 and 2024.
c. Field Operations (Overhead Lines-Operation & Maintenance) Explain why the Company spent significantly less that the amount authorized for 2020 in each of the years shown.
d. Field Operations (Underground Lines-Operation & Maintenance) Explain the reason why the Company spent less than the 2020 amount authorized in 2023, 2024 and 2025.
e. Human Resources, Education and Training. Explain the reason why the Company spent less than the 2020 amount authorized in 2021, 2023, 2024 and 2025.

f. Telecommunications. Explain why the Company did not spend the amount authorized for 2020 for each of the years shown.
g. Vegetation Management. Explain why the Company did not spend the amount authorized for 2020 for each of the years shown.
h. Materials and Supplies. Explain why the Company did not spend the amount authorized for 2020 for each of the years shown.
i. Corporate Communications. Explain why the Company did not spend the amount authorized for 2020 for each of the years shown.

OCC-375. Refer to Exhibit CLP-REVREQ-3. Provide the following:

a. Compensation Payroll Expense. Explain the reason for the increased spending in 2024 and 2025 over the prior years.
b. Field Operations (Overhead Lines-Operation & Maintenance) Explain the reason for increase in spending in the rate year as this expense has declined from 2023-2025. Provide supporting documentation (invoices, contracts, quotes)
c. Employee Benefits. Explain why the expense was negative in CY 2022.
d. Materials and Supplies. Explain why the expense was negative in CY 2024.
e. Residual O&M. Explain why the expense was negative in CY 2024.
f. Vegetation Management. Explain the reason for the decrease in spending in 2025 over the prior years amounts.
g. Human Resources, Education and Training. Explain why this expense has declined each year from 2022-2025. Does the Company expect further decreases in the rate year? If not, explain why not.
h. Legal. Explain the reason for the increased spending in 2025 over the prior years and why the Company expects this level to continue in the rate year.
i. Field Operations (Underground Lines-Operation & Maintenance) Explain the reason the overall decline in spending during the years shown.
j. Field Operations (Underground Lines-Operation & Maintenance) Explain why the Company expects this expense to increase in the rate year. Provide supporting documentation (invoices, contracts, quotes)

OCC-376. Insurance. Refer to WP C-3.19.

a. Provide documentation supporting the general liability, workers compensation premium and the public liability expense rate year adjustments (quotes, invoices, etc.)
b. Provide the loyalty credits received in each of the years 2021, 2022, 2023, 2024, and 2025.
c. Provide the actual amount of insurance expense, by insurance type shown for each year 2021, 2022, 2023, 2024, 2025, and included in the rate year.

OCC-377. Vegetation Management. Refer to WP C-3.31.

a. Provide the actual amounts in the same format for each of the years 2021, 2022, 2023, 2024, 2025 and the rate year.
b. Provide an explanation and calculations showing how each rate year adjustment was derived.
c. Provide documentation (contracts, invoices, quotes) supporting each of the rate year increases in Column E.

OCC-378. Vegetation Management. Refer to CLP-REVREQ-1 pages 113-115. Will the increases in vegetation management spending reduce future storm recovery costs? If so, has the company reflected the reductions in the revenue requirement for such savings? Identify the estimated savings and where they are reflected. If none are reflected, explain why not.

OCC-379. Employee Benefits. Refer to WP C-3.12 page 1 of 12. Provide the actual amounts in the same format for each of the years 2021, 2022, 2023, 2024, 2025 and the rate year.

OCC-380. Employee Benefits. Refer to WP C-3.12 page 2 of 12. Explain and provide the calculations for the proforma and rate year adjustments.

OCC-381. Regulatory Assessments. Refer to Exhibit CLP-REVREQ-1, page 102 Table 9. Provide the 2026 actual quarterly information in the same format.

OCC-382. Storms: Catastrophic Strom Reserve Accrual. Refer to WP C-3.26. Are the amounts on lines 28-32 nominal amounts or inflated to 2028 dollars? If they are inflated, provide the nominal amounts for each of the years shown.

OCC-383. Non-Catastrophic Storm Calculation. Refer to Exhibit CLP-REVREQ-1 page 109.

a. Explain the basis for inflating the historical years dollars to 2028 dollars.
b. State whether this approach was used by the Company in its previous rate case for non-catastrophic storm expense.
c. Identify all other expenses in the revenue requirement that the company inflated the historical dollars for utilizing an average in deriving the rate year amount.

OCC-384. Vehicle Expenses. Refer to WP C-3.32. Provide documentation supporting the rate year adjustment for insurance. (quote, invoices)

OCC-385. Deferred Environmental Remediation. Refer to WP C-3.36 page 2 of 11.

a. Is the Company planning to update this WP in its late filed exhibits to reflect actual 2026 amounts? If not, explain why not.
b. Update the WP to include 2026 year to date actuals.

OCC-386. Third Party Make Ready Pole Work. Refer to WP C-3.36 page 3 of 11.

a. Is the Company planning to update this WP in its late filed exhibits to reflect actual 2026 amounts? If not, explain why not.
b. Update the WP to include 2026 year to date actuals.

OCC-387. C&LM Gross Earnings Tax Liability. Refer to WP C-3.36 page 6 of 11.

a. Is the Company planning to update this WP in its late filed exhibits to reflect actual 2026 amounts? If not, explain why not.
b. Update the WP to include 2026 year to date actuals.

OCC-388. Fee Free. Refer to WP C-3.36 page 7 of 11.

a. Is the Company planning to update this WP in its late filed exhibits to reflect actual 2026 amounts? If not, explain why not.
b. Update the WP to include 2026 year to date actuals.

OCC-389. Employee Recognition and Awards Expense. Refer to the response to OCC 1-66.

a. State which employees are eligible to the awards program.
b. Are union employees eligible for this program ? If not, explain why not.
c. Provide supporting documentation showing how ratepayers are benefitted from these expenses.

OCC-390. (STORM FOOD & LODGING) Please refer to Exhibit CLP-STORM-1, p. 33-34.

a. For each year from 2024 to the present, please provide the maintained list of hotels and caterers that will support an event.
b. Please provide all written policies and procedures regarding and describe the process for identifying food and lodging locations for said list, including all employee positions that are part of the process.

OCC-391. (STORM STAGING) Please refer to Exhibit CLP-STORM-1, p. 34.

a. Please provide the contracts in place each year from 2024 to the present "with property owners to use their sites as staging areas."
b. For each year from 2024 to the present, please provide a list of all staging areas available.

OCC-392. (STORM LINE WORKERS) Please refer to Exhibit CLP-STORM-1, p.36, where the Company explains that it sources line workers from four categories: 1. Internal, 2. Affiliated, 3. Non-affiliated, and 4. Mutual Assistance. For every storm in 2024 and 2025, please indicate the number of line workers working that storm by each of the four categories.

OCC-393. (STORM) Please refer to Exhibit CLP-STORM-1, p. 41, where the Company states it will secure additional line crews if "necessary to restore service in a reasonable time frame…" Please define a "reasonable time frame" and cite to all Authority decisions creating that definition.

OCC-394. (STORM) Please refer to Exhibit CLP-STORM-1, p.44, where the Company states, "Eversource crew guides are assigned to external crews and remain with each crew throughout their time working on the system"

a. Does this statement mean that every external line crew has an Eversource employee with them at their job site(s) the entire time they are working?
b. If yes to a, when did this practice begin?
c. If yes to a, do these Eversource employees approve the timesheets submitted by the external crews?
d. For the storms occurring in 2024 and 2025, please provide an unlocked Excel spreadsheet listing the storm, the external crew, the Eversource crew guide assigned to that crew, and the job title of that Eversource employee.

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 12th day of August, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court