STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

November 5, 2026
Docket No. 26-05-10

Re: Docket No. 26-05-10 - Application of CL&P dba Eversource Energy to Amend its Rate Schedules

Enclosed are interrogatories **EOE-419 through EOE-444** directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company"). The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) Office of Education, Outreach, and Enforcement (EOE) in connection with the above referenced docket, and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **4pm on November 19, 2026**. If a response to any of the requested information has already been filed in response to another interrogatory response in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

EOE requests that all interrogatory responses be included in the same document, rather than responses to each interrogatory being filed as individual documents.

Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to Electronic Filing on the Authority's website for more information. **Paper filings will be accepted only if a person is unable to file electronically. The Authority reserves the right to request paper copies of certain filings at a later date.** No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by email using the following directions: confidential material must be emailed directly to **Jeff.Gaudiosi@ct.gov** in an email with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed publicly.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 et. seq. In those

exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion, a proposed protective order and nondisclosure agreement must be appended to the Motion. The Authority will rule on the Motion forthwith, and give further direction as necessary. Contact the Authority's Executive Secretary at (860) 827-1553 with questions regarding making a confidential filing.

The current service list for this docket is available on the Authority's website located at www.dpuc.state.ct.us/DPUCservlist.html.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I 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.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

The following Interrogatories, designated as EOE-419 through EOE-444, are directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company").

EOE-419. (NON-CATASTROPHIC STORMS) Refer to Response to RSR-030, Exhibit CLP-REVREQ-2, and Schedule WPC-3.28. RSR-030 requested the Company to "[p]rovide an unlocked Excel worksheet with formulas intact containing a complete listing of vendor invoices received that support the Test Year non-catastrophic/pre-staging actual expenses." [Emphasis added] Respond to the following:

a. Referring to RSR-030, Att.1, explain why the detailed information included storm work orders from 2022-2025 when the requested information was identified as being applicable to the Test Year (i.e., only 2025).
b. Referring to RSR-030, Att.1, provide both an explanation and supporting documentation for the "Other Accounting Adjustments" amount (i.e., $13,199,940) included within Row 6779.

EOE-420. (NEW VEGETATION POSITIONS) Refer to Schedule WPC-3.31 and Response to OCC-333. The Company's response to OCC-333 discusses the increase in Vegetation Management positions and reference WPC-3.31 for "the reduction in outside contractor services." Explain where the specific WPC-3.31 reduction is included and provide documentation to support both the nature and amount of the corresponding reduction. Additionally, identify the specific vendor or vendors for whom the reduction would apply. Finally, provide any analysis performed, to include a benefit-cost analysis, demonstrating the impact of hiring the additional 21 Vegetation Management positions.

EOE-421. (MS24F-VENDOR-TREE) Refer to Response to EOE-274, Exhibit ACCT-2 CLP-6, and Confidential Exhibits ACCT-2 CLP-6A-1 through CLP-6A-2. Respond to the following:

a. Referring to subsection 'a', the Company did not respond to the question as to "why some of the activity was performed at OT rates (e.g., pp. 98-100) and why the activity could not be performed by Eversource employees", please respond.
b. Referring to subsection 'b', the Company did not provide a "pre-authorization" for the billing of chippers, please provide. This request is looking for documentation that would comport with the standard vegetation contract language included within OCC-044, Att. 2, p. 1038, stating "Chippers will not be in tow or billable during restoration unless requested by Owner's Representative."

c. Referring to subsection 'b', the Company did not respond to the request to "identify the total amount charged for Disc Chippers", please respond.
d. Referring to subsection 'c', the Company did not provide the "unlocked Excel spreadsheet detailing each invoice referenced above (i.e., the referenced Rows) and identify the total number of hours billed at OT rates through 1630, along with the corresponding incremental charge", please provide.

EOE-422. (MS24F-VENDOR-TRAFFIC) Refer to Response to EOE-275, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-2, pp. 137-142. The Company's response conceded to a reduction of $200 for the invoice; however, all MS24F referenced activity occurred on April 1, 2024, prior to the April 3, 2024 evening event. Provide both an explanation and documentation demonstrating how the remaining $300 applied to the MS24F event.

EOE-423. (MS24F-VENDOR-CIVIL) Refer to Response to EOE-285, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-4, pp. 86-87. Provide a redacted version of the referenced documentation supporting the incremental charges.

EOE-424. (MS24A-VENDOR-LINE) Refer to Response to EOE-237, Exhibit ACCT-2 CLP-1, and Confidential Exhibit ACCT-2 CLP-1A-17, pp. 41-64. Respond to the following:

a. Referring to subsection 'a', please provide the requested incremental impact of billing four hours at DT rates in lieu of OT rates.
b. Referring to subsection 'd' (i.e., the Company's response referenced the response as subsection 'e'), clarify the Company's response in relation to the actual billing treatment of the vendor. Specifically, the Company's response asserted that the recording of standby was "*reflecting the physical status of the crew at a particular point in time. However, this characterization does not indicate that the crew or associated equipment was inactive or demobilized.*" Explain how the Company's response reconciles to the vendor's billing of standby at OT rates (p. 42) in lieu of the DT rates that would have applied had the vendor been in a "Work Time" status.

EOE-425. (EMPLOYEE EXPENSE MILEAGE) Refer to Responses to EOE-262 and EOE-329. The Interrogatories requested the Company to "*provide the mileage logs and other supporting documents that were available to the Eversource reviewer at the time of approval demonstrating the applicability of each cost to the … event, as well as the netting of the employee's normal commute.*" The Company's responses detailed the total miles and applicable dates but failed to detail the starting and ending locations, the purpose of the trip (i.e., supporting applicability to the respective storm

events), or provide evidence demonstrating that the employee netted their normal commute. Respond to the following:

a. Confirm that the information provided was the only information available to the Eversource reviewer. If confirmed, explain how the reviewer verified the accuracy of the incremental charge, including the netting of the employee's normal commute. If not confirmed, provide the additional information that was available.
b. The Company identified errors within the responses to both EOE-262 and EOE-329. Explain how the errors were identified and why they were not identified during the initial review.

EOE-426. (MS24F-P-CARDS) Refer to Response to EOE-327 and Exhibit ACCT-2 CLP-6 (P-Card tab). Referring to selection 'd' and the corresponding Att. 5, explain how the invoices provided support the $500 incremental charge identified. Specifically, it appears that both the subtotal of the invoices provided do not total the $500 incremental amount and the 4th invoice (i.e., EOE-327, Att.5, p. 4) was for April 2, 2024, prior to the MS24F event.

EOE-427. (MS24F-VENDOR-EQUIPMENT) Refer to Response to EOE-320, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-10, pp. 21-35. Comparing the Company's response to subsection 'c' with the outage data provided in EOE-020, Att.1, explain how the rental of generators on April 6, 2024 was applicable to the MS24F event when there does not appear to be corresponding outages in EOE-020, Att.1. As part of the response, please explain how the OMS screenprints provided at EOE-302, Att.1, support the Company's position regarding the applicability of these costs to the MS24F event.

EOE-428. (MS24F-VENDOR-TREE-DELAYED REMEDIATION) Refer to Response to EOE-310, Exhibit ACCT-2 CLP-6 (Outside Contractors tab), and Confidential Exhibits ACCT-2 CLP-6A-6 through CLP-6A-8. The Company was requested to provide details on a specific population of delayed storm remediation costs and to "*provide documentation demonstrating that the remediation was both necessary and directly applicable to the MS24F event.*" The Company's response cross-referenced to OCC-842, Att.1 which did not include the requested documentation. Please provide the information requested within EOE-310.

EOE-429. (MS24F-VENDOR-LINE) Refer to Response to EOE-273. The Company provided the Asplundh Construction Corp. contractual Exhibit B Pricing Schedule that was inadvertently omitted. Respond to the following:

a. Referring to Att.1 Redacted, provide documentation demonstrating the timing and approval of the pricing schedule for the vendor. Additionally,

identify the specific date for which the pricing schedule became effective and provide documentation of the execution.

b. Referring to Att.1 Redacted, Section 4.4(e) details that the Contractor shall reimburse the Company for any provided fuel costs. Explain how the Company accounted for the fuel reimbursement process. As part of the response, provide documentation supporting the Company's process and administration of fuel reimbursements and identify how these costs were removed from the storm recovery balances.

EOE-430. (MS24F-VENDOR-LINE) Refer to Response to EOE-273, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-1, pp. 23-62. Respond to the following:

a. Referring to subsection 'a', please confirm that the Company's reference to "tree crews" was a typo. If not confirmed, explain why tree crews are relevant to the Company's response.

b. Referring to subsection 'b', the Company was asked to provide "documentation that was available at the time of the review" for the billing of travel for two individuals (i.e., CLP-6A-1, p. 43) but no documentation was provided. Provide the requested information or confirm that there is no documentation to support the validity of the expense. Additionally, identify the total incremental impact of the billing for the two individuals, including equipment.

EOE-431. (FUEL PROVIDERS) Refer to Response to EOE-271. The Company confirmed that it pursued a competitive bid assessment for its fuel provider and provided certain details at EOE-271, Att.1. Respond to the following:

a. Referring to Redacted EOE-271, Att.1, confirm that the competitive bid assessment provided was for the two-year term from May 1, 2016 through April 30, 2018. If confirmed, identify if a subsequent competitive bid assessment has occurred that would be applicable to the current storm events (i.e., 2024-2025). If not confirmed, explain how this assessment applies to current expenses.

b. Provide the complete listing of each vendor who was solicited and identify the vendors who provided bids. Additionally, provide the detailed bid results from each respective vendor.

c. Referring to CONFIDENTIAL EOE-271, Att.1, p.4, explain how to interpret the information provided within the two Preliminary / Final Pricing tables and specifically discuss if the final price for Connecticut is higher than the initial bid amount. If the Connecticut final price is higher than the original bid, identify the percentage increase.

d. Referring to CONFIDENTIAL EOE-271, Att.1, p.4, identify the estimated fuel usage for each of the three states.

EOE-432. (MS24F-VENDOR-TRAFFIC) Refer to Response to EOE-281, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-3, pp. 136-161. The Company's response confirmed an error between MS24F and MS24E but claimed that "[t]he remaining job slips are all related to the MS24E storm." Respond to the following:

a. Identify if the Company's response included a typo where it referenced MS24E but intended to reference MS24F (i.e., the current event).
b. If subsection 'a' acknowledges a typo, provide documentation to support pp. 140-141 as being applicable to the MS24F event.
c. If subsection 'a' does not acknowledge a typo, explain why the Company is only removing $432 from the current event.
d. Referring to p. 139 and the Company's explanation that this charge applied to MS24E, provide documentation to support this response. Additionally, provide documentation for any other expenses allocated to MS24E based on the Company's responses to subsection 'b'.

EOE-433. (MS24F-VENDOR-LINE) Refer to Response to EOE-287, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-4, pp. 108-126. Respond to the following:

a. Referring to subsection 'a', EOE acknowledges the typo (i.e., MS24A versus MS24F) and requests the Company to respond in relation to MS24F. Additionally, EOE clarifies that the note section on p. 121 states: "Inclement Weather See Storm Sheet." Please provide the referenced storm sheet.
b. Referring to subsection 'b', EOE acknowledges that WO 81725834 was not charged to the MS24F event but requests a response to the original inquiry as the non-storm charge is applicable to the broader expenses being reported in the current Rate Case.

EOE-434. (MS24F-VENDOR-TREE) Refer to Response to EOE-289, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-4, pp. 193-194. The Company's response identified that it is working to locate the Eversource Connecticut Emergency Restoration Tree Contractor Work Location reports and will supplement, as appropriate. Respond to the following:

a. Referring to section 'b', identify if the vendor is entitled to the meal per diems if the Company provides actual meals. If the response is affirmative, explain why this is permitted. If the response is negative, explain how the Company ensures that vendors do not receive both the per diems and the Company provided meals, and provide the relevant documentation.
b. Provide the additional records, including the dispatch records, referenced in subsection 'c'. As part of the response, identify any

assignments that required the use of the mini excavators discussed in subsection 'd'.

c. Provide any pre-authorizations for use of the mini excavators as requested in subsection 'd'. If documentation of pre-authorization does not exist, explain why.

EOE-435. (MS24F-VENDOR-LINE) Refer to Response to EOE-291, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-4, pp. 216-233. Respond to the following:

a. Comparing the rates provided within OCC-044, Att. 2 (Confidential), p. 1277 with the rates provided within EOE-291 Att. 2 (Confidential), explain why the two pricing documents differ. Additionally, provide documentation demonstrating that the pricing schedule provided at EOE-291, Att. 2 (Confidential) was relevant to a signed contract for the E-J Electric T&D LLC vendor.

b. Comparing the rates billed within the two invoices (i.e., Ex, ACCT-2 CLP-6A-4, p. 217 with p. 223), only the 2nd invoice agrees to EOE-291 Att. 2 (Confidential). Explain why the 1st invoice does not agree to either the new EOE-291, Att. 2 (Confidential) or the original OCC-044, Att. 2 (Confidential), p. 1277.

c. Comparing the billing practice for the E-J Electric T&D LLC vendor within MS24F for the same general foreman (Confidential Exhibit ACCT-2 CLP-6A-4, p. 217 – initials of PK) to the billing practice for MS24K (Confidential Exhibit ACCT-2 CLP-12A-3, p. 2), explain why the foreman's crew billed for travel at a lower rate for the MS24K event but did not bill for any travel for the MS24F event. As part of the response, clarify if this MS24F vendor invoice should have billed for a commensurate amount of travel to the MS24K event (i.e., 3 hours of mobilization and 2 hours of demobilization) in lieu of the 18 hours classified as DT work time. If travel was incorrectly billed as work time, identify the incremental impact of the incorrect treatment of travel versus the DT work time. If travel was not billed, provide dispatch records to support the vendor's commencement of work assignments at 4:30am (i.e., given the lack of work times within boxes 24 and 25 on the Eversource Contractor Storm Daily Time & Work Reports).

To the extent that any responses above support an overbilling scenario, provide an unlocked Excel spreadsheet demonstrating the calculation of the overbilling with relevant citations and provide an explanation of how the invoice approver did not identify the error(s) during their review.

EOE-436. (MS24F-VENDOR-LINE) Refer to Response to EOE-300, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-6, pp. 202-211. Referring to subsection 'd', the Company's response did not explain why the equipment was charged during standby or identify the amount that was

charged for equipment during standby. Instead, the Company attempted to rationalize the use of the term "standby", suggesting the vendor was acting in a work capacity. Respond to the following:

a. Provide a redacted version of the referenced documentation supporting the incremental charges.
b. Explain how the Company's rationalization within subsection 'd' aligns with the vendor's actual billing of labor hours on p. 203. Specifically, p. 203 demonstrates that the vendor billed at OT rates for the three hours referenced as standby within pp. 208-211 on April 4, 2024 and then inconsistently billed for equipment between April 3, 2024 and April 4, 2024.
c. Provide an unlocked Excel spreadsheet supporting the calculations and identify the total amount that was charged for equipment during standby.

EOE-437. (ECI COMPETITIVE BID ASSESSMENT) Refer to Response to EOE-194. The Company provided a six-page summary of the Competitive Bid results for the Environmental Consultants Inc (ECI) vendor, but the documentation failed to identify the financial characteristics. Please provide details on the vendor's proposed fee structure and demonstrate how the fee structure was compared to the other vendors. If ECI was not the lowest cost option, identify the estimated percentage for which they were higher than the lowest cost option and explain why they were selected in lieu of the lowest cost option.

EOE-438. (MEAL POLICY/MS24F-VENDOR-FOOD) Refer to Response to EOE-317, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-9, pp. 170-174. The Company's response to EOE-317 provided a comparison (i.e., Att. 1) between the three sampled meal expenses and the Company's restaurant meal policy. Please confirm that the Company's comparison demonstrated a net incremental meal cost of approximately $12,694 or 29% above the amounts authorized by the Company's restaurant policy. If not confirmed, identify the amount.

EOE-439. (MS24F-VENDOR-LINE) Refer to Response to EOE-312, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-8, pp. 194-229. Respond to the following:

a. Referring to subsection 'a', provide documentation demonstrating the crew's notification (i.e., on p. 205) of being released. If documentation does not exist, identify the specific time the crew was notified.
b. Referring to subsection 'a', provide the requested incremental cost associated with the difference derived between the four hours of travel billed and the approximate two hours of travel calculated by the Company.

c. Referring to subsections 'a' and 'b', please confirm that the Company was not billed for any equipment during standby. If confirmed, explain why this billing treatment occurred. If not confirmed, provide documentation demonstrating that p. 195 aligns to the response.

EOE-440. (MS24F-VENDOR-LINE) Refer to Response to EOE-314, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-9, pp. 24-38. The Company's response to EOE-314 identified that "the Company identified a revised pricing schedule submitted by MTV to correct what the vendor identified as a clerical error in its original pricing sheet." Explain how the revised pricing schedule was approved as part of the contract negotiations and, if so, provide documentation to support this position. If not approved as part of contract negotiations, explain why the Company would allow for a subsequent revision (i.e., increase) to a pricing schedule after contracting and provide the incremental impact of this error.

EOE-441. (MS24F-VENDOR-LINE) Refer to Response to EOE-313, Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-9, pp. 11-23. The Company's response to subsection 'a', identified that the higher equipment rates in the invoice differ because "the resources associated with this invoice were not provided under the external line crew rate schedule" included in OCC-044. Respond to the following:

a. Provide documentation to demonstrate that the newly provided pricing schedule was approved during the execution of the contract. Additionally, clarify why the labor rates would be the same for this separate pricing schedule but the equipment rates would be higher and specifically explain why the Company agreed to the higher equipment rates.

b. Comparing the invoice provided at Confidential Exhibit ACCT-2 CLP-6A-9, pp. 11-15 (MS24F Event) with the invoice provided at Confidential Exhibit ACCT-2 CLP-1A-17, pp. 69-71 (MS24A Event), explain why both invoices include several of the same crew members (see e.g., Employee with initials RT on top rows of both documents) but billed for different equipment rates.

c. Provide an unlocked Excel spreadsheet detailing the equipment billed via the invoice to both the equipment rates included within the initially provided pricing schedule (i.e., OCC-044, Att.2 Confidential, pp. 4391-4395) versus the newly provided pricing schedule (EOE-313, Att.1 Confidential) and identify the incremental difference in the amount(s) charged between the two pricing schedules.

EOE-442. (MS24A-VENDOR-LINE) Refer to Response to EOE-247, Exhibit ACCT-2 CLP-1, and Confidential Exhibit ACCT-2 CLP-1A-18, pp. 1-108. EOE-247 requested the Company to provide an unlocked Excel spreadsheet analyzing the total billable travel hours in relation to the Company's "1.3

Factor" reasonability threshold. In response, the Company provided EOE-247, Att. 1 which detailed three invoices. Respond to the following:

a. Explain the Company's review process for creating the analysis at EOE-247, Att. 1. As part of the response, identify if the analysis was subject to an independent review to verify the accuracy of the response. Additionally, identify if the results are consistent with the Company's initial review performed during the approval of the invoices.

b. Please supplement EOE-247, Att. 1 with the specific starting and ending locations for each external vendor crew member. To the extent that any location differs from the Eversource Contractor Storm Mobilization & Demobilization Time Reports, provide contemporaneous documentation available to the invoice approver supporting the revised locations.

c. Referring to the Company's logic (i.e., formula) within EOE-247, Att. 1 for the derivation of Excess Labor (i.e., column S) and Excess Equipment (i.e., column T), explain why the formula uses the "ABS" function. Specifically, EOE understands this function to derive an absolute value between the estimated charge versus actual charge in lieu of a net value.

d. Referring to EOE-247, Att. 1, SPK24-01-07 tab, row 3 (as an example), explain why the Company only reported 8 hours of invoiced mobilization time for the crew member when they reported travel over two days, totaling 24 hours (see pp. 41 and 43). EOE observed that most of the sampled billable travel hours failed to account for the multiple days of reported travel. To the extent that the Company's analysis misrepresented billable travel hours, please update.

EOE-443. (MS24A-EMPLOYEE EXPENSE REIMB) Refer to Response to EOE-259 and Exhibit ACCT-2 CLP-1 (Empl. Expense&Other tab). Comparing selection f (Row 182, Reimbursement, $859) to EOE-121, please confirm that the Employee Reimbursement for various BJ's purchases (i.e., including M&Ms, Jelly Belly, etc) were excluded from the Company's summary of Snacks (i.e., EOE-121). If not confirmed, identify where this charge was included (i.e., EOE-121, Att.1 or Att.2).

EOE-444. (MUTUAL AID) Refer to Responses to EOE-039 and OCC-822. The Company's response to OCC-822 identified that "All transactions related to mutual aid provided to other utilities are recorded to FERC account 186510 (Outside Company Storm)." Please clarify if the accounting includes the reclassification of costs for employees' base salary, employees' benefits, depreciation on used equipment, property taxes on used equipment, and overhead.