Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-178	(c)	For each year 2018 through 2025, the total amount collected from interconnection customers under payment milestones, the total expended on the corresponding work orders in that year, and the balance of collected but unexpended customer funds at year-end (ALLCO-085, subpart (e))	Fully	Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource has fully responded to this subpart with analysis that the Company reasonably produce in response to this request. Eversource objects to the remainder of this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing what the Company collected from 2018 to 2025 and then manually tying amounts to each work order and next determining the unexpended funds at year end to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-178	(d)	The average and median interval, in days, between the Company's receipt of a milestone payment and the completion of the work it funded, for projects completed in each year 2020 through 2025	No	Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing payment records from 2020 through 2025 to determine when each milestone payment was received and then reviewing project documentation to try to determine the specific work that each payment funded to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-178	(e)	The amount of the "earnings credit" netted against the Company's bank fees in each year 2020 through 2025, and the portion attributable to interconnection-customer balances	No	Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing bank records for 2020 to 2025 to net the credits against the fees and then try to calculate the exact amount of the net to attributable to interconnection payments, which would also be an undue burden to create. Eversource further objects to this request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-178	(f)	The amount of short-term borrowing the Company avoided, and the interest cost avoided, in each year 2020 through 2025 by reason of holding interconnection-customer funds as working capital (ALLCO-108, subpart (c)).	Fully	N/A	N/A	Eversource has fully responded to this question. Interconnection customers are required to pay for upgrades. Because interconnection customers are financially responsible for all upgrade costs, the Company would not borrow money to complete the upgrades and, thus, has not avoided any amount of short-term borrowing.
ALLCO-195	(a)	For each of the 4 hypothetical cases, state the Load Asset to which the customer's load is assigned and the entity that holds it;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks information on four hypothetical load settlement scenarios that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-195	(b)	For each of the 4 hypothetical cases, state whether the on-site generation reduces the hourly load reported for that Load Asset, and if so how the hourly reduction is determined — in particular, for a profiled customer, whether the reduction in billed kilowatt-hours is spread across all hours of the month according to the rate-class load profile rather than assigned to the daylight hours in which the generation occurred, and whether the Company applies any solaradjusted or net-metered-customer load profile;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-195, subpart (a)
ALLCO-195	(c)	For each of the 4 hypothetical cases, state which load-serving entity's wholesale energy, capacity, and regional-network-service obligations are reduced as a result, and by what amount per kilowatt-hour of on-site consumption;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-195, subpart (a)
ALLCO-195	(d)	For each of the 4 hypothetical cases, provide a worked example for a customer consuming 1,000 kWh in a month of which 400 kWh is supplied by on-site solar, showing the kilowatt-hours reported to ISO-NE for the customer's Load Asset in each case	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-195, subpart (a)
ALLCO-196	(a)	For each of the same 4 hypothetical cases in ALLCO-195, describe step-by-step, with citations, how energy is treated in the load settlement process and state whether the exported kilowatt-hours are metered as a separate channel and, if so, whether they are reported to ISO-NE as generation, as negative load on the host customer's Load Asset, as a reduction of the Metering Domain total that is allocated among all Load Assets, or otherwise	No.	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks detailed analysis on four hypothetical load settlement scenarios that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-196	(b)	For each of the same 4 hypothetical cases in ALLCO-195, state the precise mechanism — section of Manual M-28 or other authority — by which, as the Company stated in ALLCO-095(a), "[t]he excess wholesale generation is distributed amongst all LSEs in the load zone," including whether the distribution is made in proportion to each LSE's share of load in the Company's Metering Domain, in the Connecticut load zone, or otherwise, and whether it is made hourly or monthly;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-196, subpart (a)
ALLCO-196	(c)	For each of the same 4 hypothetical cases in ALLCO-195, whether the exported energy is reflected in any Load Asset's coincident-peak contribution used to set capacity load obligations and regional network service charges, and for whose benefit;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-196, subpart (a)
ALLCO-196	(d)	For each of the same 4 hypothetical cases in ALLCO-195, whether the same treatment applies to the entire output of a facility that exports all of its generation — including facilities compensated under the buy-all option of the Non-Residential Renewable Energy Solutions, Shared Clean Energy Facility, and Residential Renewable Energy Solutions tariffs, LREC/ZREC facilities, and qualifying facilities selling under power purchase agreements — and if not, how the output of each such category is treated	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-196, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-196	(e)	For each of the same 4 hypothetical cases in ALLCO-195, a worked example for a 2 MW facility exporting 300 MWh in a month, showing the kilowatt-hours by which each Load Asset in the Company's Metering Domain is reduced, assuming Standard Service and Last Resort Service represent the percentage of Metering Domain load that they represented in the Test Year (state that percentage)	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-196, subpart (a)
ALLCO-197	(a)	For those facilities whose output is purchased and whose cost is recovered through the NBFMCC, confirm that, under the treatment described in ALLCO-095(a), the wholesale energy value of that output is distributed to every load-serving entity in the load zone, including third-party suppliers that bear none of the tariff cost, in proportion to their load	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks detailed analysis related to ISO-NE load settlement that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-197	(b)	For those facilities whose output is purchased and whose cost is recovered through the NBFMCC, state, for each calendar year 2020 through 2025, the total megawatt-hours of such exported output in the Company's Metering Domain, the share distributed to Load Assets held by third-party suppliers, and the value of that share at the applicable hourly real-time locational marginal prices	No	Materiality; Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-197, subpart (a). Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without determining the annual output for 2020 to 2025 and then performing an analysis to determine the third party supplier share and then calculating the value for that share, which would also be an undue burden to create.
ALLCO-197	(c)	For those facilities whose output is purchased and whose cost is recovered through the NBFMCC, state whether the Company's Standard Service and Last Resort Service procurement and reconciliation reflect any credit for that output and where;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-197, subpart (a).

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-197	(d)	For those facilities whose output is purchased and whose cost is recovered through the NBFMCC, state, state whether any portion of the capacity value, forward-reserve value, or regional network service reduction associated with that output accrues to third-party suppliers, and quantify it.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-197, subpart (a).
ALLCO-198	(a)	Explain treatment of projects as load reducers, and identify the customers who receive the benefit — the Company's Standard Service and Last Resort Service customers, customers of third-party suppliers, all distribution customers, or some other group — and quantify the benefit to each group for each year 2020 through 2025 in megawatt-hours, in capacity megawatts, and in dollars;	No	Unduly Repetitious; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Please refer to the Company's response to ALLCO-042 where in response to a similar question Eversource stated that it could not quantify such savings. Moreover, the Company has already responded to numerous requests for similar information. See the Company's responses to ALLCO-040, ALLCO-087, ALLCO-095, ALLCO-096, and ALLCO-097. Eversource objects to this request as unduly repetitious. Eversource further objects to this request because it seeks analysis related to load reducer treatment that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-198	(b)	Explain treatment of projects as load reducers, and identify the docket, decision, or ruling in which the Authority "acknowledged and accepted" the practice of not registering resources under 5 MW, and produce it.	No	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to subpart (a)
ALLCO-198	(c)	Explain treatment of projects as load reducers, and compare the treatment in subpart (a) with the treatment that would result if a facility whose output the Company purchases were registered as a Settlement Only Resource — in which case its metered output would be settled at the locational marginal price to the account of the Company as purchaser — and state whether the Company has ever evaluated registering, as Settlement Only Resources or otherwise, facilities whose output it purchases under buy-all tariffs or power purchase agreements, so that the energy and capacity value of that output accrues to the customers who pay for it; produce each such evaluation or state that none exists.	No	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-198, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-198	(d)	Explain treatment of projects as load reducers, and state whether the Company's load forecasts used for Standard Service procurement, and the Standard Service bids it receives, reflect the load-reducing effect of behind-the-meter generation, and if so how, so that the Authority can determine whether the claimed benefit reaches Standard Service customers in the price they pay	No	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-198, subpart (a)
ALLCO-198	(e)	Explain treatment of projects as load reducers, and state whether the Company's statement in ALLCO-087 that "no individual or group determines" whether a resource under 5 MW is registered with ISO-NE remains accurate, and if so identify the person or group responsible for the Company's compliance with ISO-NE registration and metering requirements for distributed resources.	No	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-198, subpart (a)
ALLCO-199	(a)	Identify each Load Settlement System used for the Company's Metering Domain in each year 2019 through 2026, its vendor, the ESC or Company organization that operates it, the number of personnel assigned, and the portion of its cost charged or allocated to the Company in the Test Year and Rate Year, with schedule references;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks information pertaining to ISO-NE-related load settlement software that is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-199	(b)	state whether the Omni retail billing platform, or the same platform under another name, has been or is scheduled to be implemented for the Company's Connecticut customers, the actual or scheduled implementation date, the project budget and amounts spent through the most recent date available, the amount included in the Test Year, Test Year Pro Forma, or Rate Year (expense or plant), and the schedule and workpaper references	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-199, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-199	(c)	state whether the Load Settlement System used for the Company is the same system (Retail Operations, developed by Hitachi) that Eversource Energy identified in EL26-5 as the system NSTAR Electric Company uses, and whether the defects described in EL26-5 — load "assigned to the same accounts multiple times" and "a doubling of customer loads for certain commercial, industrial, and residential customers" — were present in, tested for, or corrected in the Company's system	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks analysis related to ISO-NE load settlement software that is the subject of a complaint against the Company's affiliate, NSTAR electric, at FERC (Docket No. EL26-5-000) that is not material to the Company'sdistribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-199	(d)	describe the "enhanced monitoring, validation, and review procedures for load settlement data" that Eversource Energy told the Commission NSTAR has implemented, state whether and when each was implemented for the Company's Metering Domain, and produce the procedures.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-199, subpart (d)
ALLCO-200	(a)	For each calendar year 2019 through 2026 to-date, state in native format, the number of Meter Data Error correction requests, Requested Billing Adjustments, and resettlement submissions made by or on behalf of the Company as Assigned Meter Reader or Host Participant for its Metering Domain, the month(s) of load affected, the megawatt-hours and dollar amount of each correction, and the Load Assets (by LSE category: Standard Service, Last Resort Service, third-party supplier) whose load was increased or decreased	No	Materiality; Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks information pertaining to corrections to historical meter data and resettlements that has no bearing on the reasonableness of the Company's rates, charges, or cost recovery at issue and is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without researching this issue from 2019 to-date and then for the information responsive to this request performing additional analysis in order to create the requested analysis, which would also be an undue burden to create. Allco's Offer of Proof for ALLCO-200(a) rests on the premise that, because wholesale load obligations may have a remote and tenuous connection to Eversource's rate application, every interrogatory on that subject must be answered. This premise is unfounded and should be rejected. Allco has failed to show how the load settlement matters raised in ALLCO-200 are relevant to Eversource's proposed revenue requirement. In particular, Allco's request for information on meter data errors and resettlement counts pertains to ISO-NE wholesale settlement procedures, not the Company's distribution rates. There is a clear difference between information necessary to assess the Company's cost of service and information Allco seeks to pursue its own theory regarding wholesale settlements. The information requested in ALLCO-200 clearly falls into the latter category.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-200	(b)	For each calendar year 2019 through 2026 to-date, the number of inquiries, disputes, or complaints received from licensed third-party suppliers concerning the load assigned to their Load Assets, and their disposition;	No	Materiality; Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-200, subpart (a).
ALLCO-200	(c)	For each calendar year 2019 through 2026 to-date, whether any error in the Company's reported load affected the load assigned to the Company's Standard Service or Last Resort Service Load Assets, the megawatt-hours and dollar effect, and how any resulting over- or under-collection was treated in the Standard Service, Last Resort Service, or Generation Services Charge reconciliations;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-200, subpart (a).
ALLCO-200	(d)	For each calendar year 2019 through 2026, state whether the Company's reported load affected the Company's or any supplier's Renewable Portfolio Standard obligation under Conn. Gen. Stat. § 16-245a and whether any correction was reported to the Authority or the Department of Energy and Environmental Protection	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because the Company's Renewable Portfolio Standard Obligations are not material to the Company's distribution rate case application, nor are they relevant to determine whether a material fact in the Company's rate case application is more or less probable. The requests fails to demonstrate that historical meter data or corrections to RPS reporting are relevant to the Company's rates, charges, or cost recovery at issue.
ALLCO-200	(e)	Each notice given to the Authority, the Office of Consumer Counsel, or ISO-NE concerning Errors in the Company's load settlement data since January 1, 2024, with the date and a copy.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this requests because notices to PURA, the Office of Consumer Counsel, or ISO-NE concerning load settlement data are not material to the Company's distribution rate case application, nor are they relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-201	(a)	Load Settlement Report and EL26-5: state whether the Internal Audit review of the ISO-NE load settlement process that the Company identified in ALLCO-065 through ALLCO-067 (requested April 25, 2025; engagement memorandum May 19, 2025; final report January 7, 2026) examined the Company's Connecticut Metering Domain, the NSTAR Metering Domains, or both, and whether it examined the Omni-related defects at issue in EL26-5	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because the information requested is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. The scope and findings of an internal audit review of ISO-NE load settlement processes, including metering domains and an unrelated FERC proceeding (Docket No. EL26-5) have no demonstrated relevance to the Company's proposals in this case. Allco's Offer of Proof for ALLCO-201(a) rests on the premise that, because wholesale load obligations may have some remote and tenuous connection to Eversource's rate application, every interrogatory concerning that subject must necessarily be answered. That premise fails. Allco has not demonstrated any relationship between the load settlement information sought in ALLCO-201 and Eversource's proposed revenue requirement—nor could it, because Allco's requests concern ISO-NE wholesale load settlement, not distribution rates. There is a clear distinction between information needed to evaluate the Company's cost-of-service and information Allco seeks to use to develop an independent theory concerning wholesale settlements. The information sought in ALLCO-201 plainly falls into the latter category.
ALLCO-201	(b)	Load Settlement Report and EL26-5:state whether the Company's response to ALLCO-068 — that EL26-5 is the only litigation and that it concerns load settlement "solely in Massachusetts" — remains accurate in light of the fact that Eversource Energy, the parent whose service-company costs are allocated to the Company, is a named respondent, and identify every other complaint, dispute, or proceeding since January 1, 2024 concerning load settlement data reported by any Eversource electric distribution company;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-201, subpart (a). Moreover, litigation, complaints, and disputes related to load settlement issues involving Eversource or its affiliates do not pertain to the prudence, reasonableness, or recoverability of the costs at issue in this proceeding. Additionally, the existence or scope of proceedings in other jurisdictions has no demonstrated relevance to the issues in this rate case.
ALLCO-201	(c)	Load Settlement Report and EL26-5:state the total cost incurred by Eversource Energy, ESC, NSTAR, and the Company in connection with EL26-5 and the related reconciliation work described in Eversource's March 6, 2026 answer (dedicated processing environment; rerunning settlement data; integrity checks; meetings with the Massachusetts Department of Energy Resources), including outside counsel, consultants, vendor remediation, and internal labor, and the portion of each charged or allocated to the Company, with FERC account and schedule references	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-201, subpart (a). Moreover, consolidated cost information regarding litigation and reconciliation activities involving multiple Eversource affiliates and Massachusetts operations is not reasonably related to CL&P's Connecticut jurisdicitonal expenses or costs recoverable in this proceeding.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-201	(d)	Load Settlement Report and EL26-5:state whether any cost of remediating load settlement defects, of resettling Massachusetts invoices, or of defending EL26 5 is included in the Test Year, Test Year Pro Forma, or Rate Year cost of service of the Company, directly or through ESC allocation, and if so the amount and the basis for charging it to Connecticut customers.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-201, subpart (a). Moreover, this request assumes, without foundation, that costs related to Massachusetts load settlement, invoice resettlements, and litigation fall within the scope of this Connecticut rate case, despite no demonstrated connection between those activities and the CL&P's provision of regulated electric distribution service in Connecticut.
ALLCO-202	(a)	Allco Applications: For each of those steps, state the Guideline or study-agreement timeline the Company contends applied, the date it expired, the reason the step was not completed within it, and whether the Company gave the applicant the notice, explanation, and estimated completion date that Section 5.1 of the Guidelines requires when a deadline is missed, with the date of each such notice.	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome.	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because compliance with Guideline timeframes with respect to Allco applications is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing Eversource personnel and contractor email records for each Allco project to determine whether specific timeframes were met and then compiling that information to create a spreadsheet with the requested analysis, which would also be an undue burden to create. See also Eversource's supplement to Motion Nos. 084 & 099, Table 1 at ALLCO-122(a).
ALLCO-202	(b)	For every application over 1 MW received since January 1, 2020, state in native format the elapsed days from application to the Company's first substantive notice, from feasibility study agreement to feasibility study delivery, and from system impact study agreement to system impact study delivery, and the number and percentage of applications for which each Guideline timeline was met.	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome.	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because compliance with Guideline timeframes between the requested actions for all applications over 1MW since 2020 is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing records and then performing a "chess clock" analysis for all applications to determine the extent to which specific timeframes were met and then compiling that information to create a spreadsheet with the requested analysis, which would also be an undue burden to create.
ALLCO-202	(c)	Identify the person(s) by title responsible in 2024, 2025, and 2026 for monitoring compliance with the Guideline timelines for applications over 1 MW, and each report of non-compliance made to Company management or the Authority.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this subpart because any requirement (or lack thereof) under the Guidelines to monitor compliance with timeframes is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-203	(a)	20MW substation threshhold and Level III transmission study: the ISO-NE Planning Procedure, Tariff section, or other written authority, by section and effective date, on which the Company relies for the 20 MW threshold and for treating the sum of "on line and in the queue" distributed generation as the measure against that threshold, and produce it	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this subpart because analysis of the transmission-related ISO-Planning Procedure Tariff section is not material to the review of the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-203	(b)	for each Spencer Hill Application, the date on which the Company submitted a Generator Notification Form, Proposed Plan Application, PP5 notice, or other information to ISO-NE, what was submitted, the date and content of each ISO-NE response, and specifically whether ISO-NE — as distinct from the Company — determined that a Level III analysis was required, and on what date;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because analysis of what has been submitted to ISO-NE, pursuant to requirements over which the Company has no control, for specific Allco projects is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-203	(c)	whether the Company's practice is to make the Level III determination itself before submitting any notice to ISO-NE, and if so since when, under what written procedure, and whether that practice has been reviewed by the Authority;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because ISO-NE-related requirements over which the Company has no control are not material to the Company's distribution rate case application, nor are they relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-203	(d)	reconcile the 62 MW, 56.9 MW (18.5 + 38.4), and 62.2 MW (18.7 + 43.5) figures the Company gave within six weeks, and state the date as of which each was measured;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the reconciliation of stated amounts of DER online and in the queue within a specific timeframe is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-203	(e)	in native format, each distributed generation project over 1 MW "on line" or "in the queue" at the Campville 14R substation as of October 24, 2024 and as of the date of response (applicant identities other than Allco may be anonymized), with its nameplate capacity, application date, PowerClerk status, whether it was required to undergo a Level III transmission study, the dates that study began and ended, and whether it has been interconnected	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Publicly Available	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because queue information as of two specific points in time, along with analysis of ISO-NE related requirements (which is outside of Eversource's control), is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing records for projects listed as online and in the queue to determine whether or not an ISO-NE Level 3 transmission study was required and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because as stated in the Company's response much of the requested information is publicly available.
ALLCO-203	(f)	for each year 2020 through 2025, the number of applications over 1 MW that the Company determined required a Level III transmission study, the number that have completed that study, the average and median elapsed time from determination to study completion, and the number that withdrew while awaiting the study.	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because analysis of the number of applications subject to specific ISO-NE requirements (which is outside of the Company's control) is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing records from 2020 through 2025 for this ISO-NE-related requirement and then analyzing the Company's records to locate the requested information and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-204	(a)	Allco Applications: how the $75,000 and $85,000 figures were determined, why the figure increased between July and September 2024, the components each covers (distribution system impact study, transmission study, PSCAD model review, ISO NE charges, or other), the account in which the $85,000 is held, the amount expended against it to date with supporting detail, and whether any unexpended balance earns interest for the applicant;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because analysis of amounts determined for ISO-NE-related requirements (which is outside of the Company's control) pertaining to specific Allco projects is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-204	(b)	the name, ISO-NE designation, scheduled and actual start date, scheduled and actual completion date, and number and aggregate megawatts of projects in each ISO-NE cluster, ASO, or group transmission study in which any Company distribution interconnection application has been included since 2022, and the study in which the Spencer Hill Applications are now included, with its current expected completion date;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because analysis of interconnection applications since 2022 that are subject to specific ISO-NE requirements (which is outside of the Company's control) is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing records from since 2022 for ISO-NE-related requirements and then analyzing the Company's records to locate the requested information and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-204	(c)	the date on which the Company knew that models had to be approved by October 2024 for inclusion in the 2025 study cycle, why that cut-off was not stated in the September 2024 agreement or notice, and the date on which it was first communicated to the applicant;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because analysis of amounts determined for ISO-NE-related requirements (over which the Company has no control) pertaining to specific Allco projects is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-204	(d)	the number of applications that missed inclusion in an ISO-NE study cycle since 2022 because a Company requirement or cut-off was communicated after the cycle closed, and the resulting delay for each;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the exclusion of applications in ISO-NE study cycles (over which the Company has no control) since 2022, if any, and the reasons for any such exclusions are not material to the Company's distribution rate case application, nor are they relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-204	(e)	whether the "ASO Study timelines" that govern the duration of the study under Exhibit C are published, and if so produce the schedule in effect on September 18, 2024 and today	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because the requested information about ASO studies, which are an ISO-related requirement (over which the Company has no control), is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-205	(a)	Allco Applications: the date on which the Company's records show each delivery of the models was received, by whom, and the date on which each was reviewed;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because the requested information about PSCAD models, which are an ISO-related requirement (over which the Company has no control), for Allco-related applications is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-205	(b)	Allco Applications:whether PowerClerk is configured to send an e-mail to the applicant when a deficiency notice or other status change is posted, whether that configuration was in effect on December 18, 2025, and whether the Company has audited whether such notices were delivered to applicants between October 2025 and May 2026, with the results;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Please see Eversource's supplement to Motion Nos. 084 & 099, Table 1 at ALLCO-121(a). **Subject to PURA's ruling on Motion Nos. 084, 099, and 113, the Company proposes to submit the printout of 140 different statuses in PowerClerk and clarify whether PowerClerk includes such statuses and the implementation date, if it can be determined.** Eversource objects to the remainder of the request because whether or not the Company audited ISO-NE-related notices for Allco-related applications is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-205	(c)	Allco Applications:the number of applications for which a Company request for additional information or a deficiency notice remained unanswered for more than 90 days between January 1, 2024 and the present, and whether the Company followed up in each case;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because information related to Company deficiency notices/requests for additional information, issued between 2024 and the present, pertaining to ISO-NE requirements (over which the Company has no control) is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-205	(d)	Allco Applications:the number of engineers and project managers (employees and contractors, including Burns & McDonnell personnel) assigned to transmission-level review of distributed generation applications in each year 2023 through 2026, the turnover in that group, and the cost of the group charged to the Company in the Test Year and Rate Year, with schedule references	No	Materiality; Relevance; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because information related to engineers and project managers assigned to an ISO-NE requirement (over which the Company has no conrol) between 2023 and 2026 is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Please also refer to the Company's responses ALLCO-109, which cites to ALLCO-010 and ALLCO-055, Based on the information in these responses, Eversource further objects to this request as unduly repetitious.
ALLCO-205	(e)	Allco Applications: whether the Company contends that any portion of the delay in Allco's Applications since September 25, 2024 is attributable to the applicant, and if so the specific period and reason.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because information related to any delays by Allco with respect to an ISO-NE requirement (over which the Company has no control) for specific Allco applications is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-206	(a)	Allco Applications: whether the Company has countersigned that Interconnection Agreement (INT-60394), and if so the date and the date it was transmitted to the applicant; if not, why not, and what the PowerClerk status "Awaiting Fulfillment of Milestone Requirements and Municipal Approval" contends remains outstanding;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because information related to the countersignature of a single Allco Interconnection Agreement is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-206	(b)	Allco Applications: the Company's practice and average elapsed time, for all applications since January 1, 2020, between receipt of a generator-executed Interconnection Agreement and the Company's countersignature, and the number of agreements that have remained uncountersigned for more than 90 days, 180 days, and one year;	No	Materiality; Relevance; Unduly Repetitious Evidence	C.G.S. §§ 4-177c(a) & 4-178(1)	Please see the Company's response to ALLCO-017 and Eversource's supplement to Motion Nos. 084 & 099, Table 1 at ALLCO-017. The Company stated that it does not track this information and that such functionality was added to PowerClerk in early 2026 so that execution dates are "now" recorded. This functionality was added on a going-forward basis; consequently, historical information is not available in PowerClerk and cannot be produced. Eversource also objects to this request because the requested information the elapsed time between generator execution and Company execution since 2020 is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. The Company stated that it does not track this information and that such functionality was added to PowerClerk in early 2026 so that execution dates are "now" recorded. This functionality was added on a going-forward basis; consequently, historical information is not available in PowerClerk and cannot be produced. Based on the above citations, Eversource also objects to this request as unduly repetitious.
ALLCO-206	(c)	Allco Applications: what the "CIAC - 16%" line represents, how the 16 percent rate was derived, whether it is the same percentage overhead that the Company's December 2024 Final Accounting Reports for other Allco clusters described as having been "allocated at time of deposit" and "refunded in full," and the percentage applied to every Interconnection Agreement issued in each year 2020 through 2026	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the derivation of specific CIAC information for one Allco project, comparing that information to certain other Allco project CIAC information, and then determining overhead percentages applied to every project from 2020 to present is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to the portion of the request that requested overhead percentages applied to every project from 2020 to present because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing accounting records from since 2020, determining the percentage applied, and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-206	(d)	Allco Applications: the identity (anonymized) and status of the "project ahead in the queue," the estimated cost of the upgrades it is responsible for, the deadline by which it must proceed, and the written procedure by which those costs would be reassigned to INT-60394 or any other later applicant if it does not.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because detailed information about a non-Allco project ahead of an Allco project in the interconnection queue is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-207	(a)	NBFMCC Credits: For each calendar year 2021 through 2026 (year to date) and each program, state in native format for every amount treated as a sacrifice: the contract or tariff agreement identifier, the counterparty (which may be anonymized other than Allco and its affiliates), the date the amount was received, the date and amount of the forfeiture, the contract or tariff provision invoked, and the Company officer who approved the forfeiture;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the requested information beyond what the Company provided in response to OCC-894, namely, from 2021 to present, for each program, contract and forfeiture related information, including the identification of Company personnel, that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing contracts and business records from since 2021 to locate the requested information and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-207	(b)	See subpart (a), state in native format for every amount treated as a sacrifice: whether the counterparty had, before the forfeiture, declared force majeure, requested an extension, invoked a dispute-resolution provision, or otherwise disputed the Company's right to the funds, and whether any forfeited amount has since been returned, credited, or is the subject of a pending claim;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the requested information beyond what the Company provided in response to OCC-894, namely, from 2021 to present, for each program, whether generators invoked specific contractual rights under interconnection agreement and the status of such amounts, that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing business records from since 2021 to locate the requested information and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-207	(c)	See subpart (a): the RAM docket, exhibit, and line in which the sacrifice was submitted for recovery and the amount by which it reduced the NBFMCC revenue requirement;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the requested information beyond what the Company provided in response to OCC-894, namely, information from RAM dockets dating back to 2021 and then subsequently calculating the reduction in the revenue requirement in those dockets, that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-207	(d)	See supbart (a): the FERC account in which the funds were held before forfeiture and the account to which they were transferred, and whether interest was accrued or credited at any point;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because FERC account information relative to "sacrifices" under state renewable energy programs is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-207	(e)	See subpart (a):specifically, whether any amount received from Allco-related companies, or any project-level affiliate — including the Performance Assurance of $367,169.88 posted under the October 21, 2020 REC contracts and the equal amount posted with the March 31, 2023 extension requests, the Development Period Security under the April 12, 2021 power purchase agreements, the Operating Period Security under the three agreements terminated March 31, 2023, the Development Period Security under the four agreements the Sellers terminated effective July 23, 2024, and the $225,000 of SCEF Year 6 bid deposits wired March 5, 2025 — has been treated as a sacrifice, recorded as program revenue, or submitted for recovery in any docket, and if so the year, docket, exhibit, and amount;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the requested information beyond what the Company provided in response to OCC-894, namely, information on Allco-specific "sacrifices," that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-207	(f)	See subpart (a): with respect to the statement that "[n]o amounts were returned to SCEF program customers" because Development Period Security "was applied toward and converted into the Operating Period Security," state how bid deposits for bids that were not selected — which Section 3.5 of the SCEF Program Manual requires the EDC to return — are recorded, how many such deposits were received and returned in each SCEF solicitation year, the aggregate amount of unselected bid deposits held at year-end 2025 and at the most recent date available, and the reason any such deposit has been held more than 60 days after selection results;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because the treatment of bid deposits for the SCEF program, amounts held at a specific time, and the rationale for retention of deposits (if any) are not material to the Company's rate case application, nor are they relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-207	(g)	See subpart (a): whether the Company contends that a forfeiture it has credited to ratepayers through the NBFMCC must be reversed through the same mechanism if the counterparty prevails in a dispute over it, and how that contingency is reflected in the Company's accounts.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because a hypothetical on reversing a "sacrifice" credited through the NBFMCC is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-208	(a)	Final Accountings: for each calendar year 2017 through 2025, the number of interconnection projects first connected to the electric power system in that year for which no final accounting report had been issued as of September 30, 2026, and the aggregate amounts collected from the interconnecting customers for those projects, stated separately for construction deposits and for percentage overhead or CIAC components;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because information on projects that are still in the process of being trued-up (i.e., the Company is still receiving invoices from contractors and their subcontractors) for final reconciliation purposes pursuant to the Guidelines and the Interconnection Agreement is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-208	(b)	Final Accountings: the aggregate amount of those collections the Company still holds and the account(s) in which it is recorded;	No	Materiality; Relevance; Unduly Repetitious Evidence	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to subpart (a). In addition, the amounts paid by developers are used to fund construction of the upgrades; thus, any amounts still held cannot be determined until the true-up is performed. Eversource further objects to the portion of the request that asks about the account(s) in which it is recorded as unduly reptitious evidence. See Eversource response to ALLCO-001
ALLCO-208	(c)	Final Accountings: whether the Company contends that no refunds would be due on those projects if final accountings were performed, and the basis	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to subpart (a). In addition, the Company cannot make such a determination if the true-up has not been performed.
ALLCO-208	(d)	Final Accountings: each reason final accountings have not been performed, the person by title responsible for deciding whether and when they are performed, and the Company's plan and schedule for clearing the backlog.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to subpart (a). In addition, the identification of specific company personnel is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-209	(a)	in native format, from the Company's own records rather than by reference to a map, each bulk and distribution substation at which DER online plus DER in queue equaled or exceeded 20 MW as of December 31, 2025 and as of the most recent date available, with DER online (MW), DER in queue (MW), the number and aggregate MW of pending applications, and the number of pending applications over 1 MW;	Fully	Publicly Available	C.G.S. § 4-177c(a)(1)	The Company responded that it could not asnwer the question. See Eversource response to ALLCO-209(a). Eversource further objects because Allco is requesting that the Company perform analysis, as of the most recent data available, of specific information that is publicly available to Allco.
ALLCO-209	(b)	for each such substation, each project in the Application, the Targeted System Performance plan, the SHARE proposal, or the 2026 capital plan (CLP ADDITIONS-4 Supplemental) that would increase hosting capacity, relieve a thermal or voltage constraint, or replace a transformer at that substation, with its estimated cost and proposed rate	Fully	N/A	N/A	The Company responded that it could not asnwer the question. See Eversource response to ALLCO-209(b).
ALLCO-209	(c)	yes or no, whether amounts collected from interconnection customers for upgrades at any such substation are credited against the gross cost of the related plant before it is included in rate base, and if yes, identify the CIAC-funded plant placed in service in 2023, 2024, 2025 and 2026 at each such substation and the CIAC offset recorded for each;	Fully	N/A	N/A	The Company responded that it could not asnwer the question. See Eversource response to ALLCO-209(c).
ALLCO-209	(d)	whether any plant whose cost was recovered in whole or part from an interconnection customer is included in the Test Year, Test Year Pro Forma, or Rate Year rate base at gross cost pending "final project billing and reconciliation (ALLCO-002), and the amount.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because this information pertaining to upgrades funded by interconnection customers that are still in the process of being trued-up (i.e., the Company is still receiving invoices from contractors and their subcontractors) for final reconciliation purposes pursuant to the Guidelines and the Interconnection Agreement is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-210	(a)	Sec. 16-243p(b) advice: state the firm and title of the attorney who gave the advice, the date, and the Company personnel to whom it was given;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	The identification of specific company personnel and/or outside counsel is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-210	(b)	Sec. 16-243p(b) advice: whether the Company intends to rely on that advice, in whole or in part, to support recovery of confidentiality-designation and redaction costs, and if so whether it will produce it;	No	Privilege	C.G.S. § 4-178(2)	Eversource objects to the request because it seeks disclosure of information that is subject to the attorney-client privilege (re: discussions relating to advice) and the work product privilege (production of advice). Please also see Eversource response to ALLCO-034.
ALLCO-210	(c)	Sec. 16-243p(b) advice: in the Company's own words and without reference to counsel — the question ALLCO-123(d) asked and the response did not address — each reason the Company contends that redaction and confidentiality-designation work performed for filings and discovery responses in this proceeding is not a "direct or indirect cost[] associated with its … participation in" the proceeding under § 16-243p(b); whether fees paid or payable to Keegan Werlin LLP or TCDI for that work are "attorneys' fees" or "fees to engage … consultants"; and whether the time of internal counsel and project-management staff devoted to it is "the portion of employee salaries associated with such … participation";	No	Privilege	C.G.S. § 4-178(2)	Eversource objects to the request because it seeks disclosure of information that is subject to the attorney-client privilege and the work product privilege. Please also see Eversource response to ALLCO-034.
ALLCO-210	(d)	Sec. 16-243p(b) advice: the amount of redaction and confidentiality designation cost included in the Test Year, Test Year Pro Forma, or Rate Year cost of service or in any deferral, with the schedule and line;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because redaction costs incurred in this proceeding, subsequent to the submittal of the Company's rate case application, is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-210	(e)	Sec. 16-243p(b) advice: each other category of cost of this proceeding the Company contends is recoverable because it is "incurred to comply with legal obligations," with the amount and schedule reference	No	Privilege	C.G.S. § 4-178(2)	Eversource objects to the request because it seeks disclosure of information that is subject to the attorney-client privilege and the work product privilege.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-211	(a)	Keegan Werlin redaction: State: (a) the date of that engagement, whether it is a separate engagement or an expansion of the rate case engagement, the hourly rates or other basis of compensation, any budget, estimate, or not-to-exceed amount, and the Company personnel who approved it, and produce the engagement letter, statement of work, or e-mail by which it was made;	No	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request as seeking substantially the same information in prior requests. Please see the Company's responses to ALLCO-034 and ALLCO-124, which are cited in the Company's response to ALLCO-211. As the Company stated in ALLCO-034(c), the Company is tracking costs associated with redaction and confidentiality-designation work and plans to seek recovery in this proceeding. Eversource further objects to the portion of the request that seeks the identification of Eversource personnel because this information is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable,
ALLCO-211	(b)	Keegan Werlin redaction: the hours recorded by Keegan Werlin on redaction and confidentiality-designation work through September 30, 2026 and through the most recent date available, whether or not invoiced;	No	Unduly Repetitious;	C.G.S. § 4-178(1)	Eversource objects to this request as seeking substantially the same information in prior requests. Please see the Company's responses to ALLCO-034 and ALLCO-124, which are cited in the Company's response to ALLCO-211. As the Company stated in ALLCO-034(b), the Company will supplement its response when the information becomes available.
ALLCO-211	(c)	Keegan Werlin redaction: TCDI's total billings through the most recent date available and the Company's current estimate of total TCDI cost for the proceeding;	No	Unduly Repetitious;	C.G.S. § 4-178(1)	Eversource objects to this request as seeking substantially the same information in prior requests. Please see the Company's responses to ALLCO-034 and ALLCO-124, which are cited in the Company's response to ALLCO-211. As the Company stated in ALLCO-034(b), the Company will supplement its response when the information becomes available.
ALLCO-211	(d)	Keegan Werlin redaction: for each month since the Application was filed, by title, the hours and loaded cost of internal legal, project-management, and regulatory personnel devoted to redaction and confidentiality-designation work, using time records where they exist and a documented estimate stating its basis where they do not;	No	Unduly Repetitious;	C.G.S. § 4-178(1)	Please see the Company's responses to ALLCO-034 and ALLCO-124, which are cited in the Company's response to ALLCO-211. As the Company stated in ALLCO-034(b), the Company will supplement its response when the information becomes available.
ALLCO-211	(e)	Keegan Werlin redaction: the account(s) to which each amount has been charged and whether any amount has been deferred.	No	Unduly Repetitious;	C.G.S. § 4-178(1)	Please see the Company's responses to ALLCO-034 and ALLCO-124, which are cited in the Company's response to ALLCO-211. As the Company stated in ALLCO-034(b), the Company will supplement its response when the information becomes available.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-212	(a)	Burns & McDonnell charges: for all customers, state for each calendar year 2020 through 2025, the total Burns & McDonnell charges applied to distributed-generation interconnection work orders, the number of work orders so charged, the hourly rates charged by labor category, and any markup, fee, or multiplier applied;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks detailed analysis related to costs that are entirely billed to interconnection customers that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing project level documentation since 2022 to locate the request information and then use that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to the request as unduly reptitious. In response to ALLCO-109, the Company confirmed that Burns & McDonnell employees charge their time to individual work orders, that those charges are applied against the customer payments, and that the compensation does not vary with the amounts estimated, billed, or collected from interconnecting customers. In addition, as stated in the Company's response to ALLCO-055, the Burns & McDonnell costs are not recovered through the approximately $1.257 million in annual interconnection program administration costs identified in ALLCO-010. ALLCO's repeated requests for the same, or substantially the same information, despite having received responses, serve no legitimate purpose. Allco's Offer of Proof fails to establish that the requested aggregated annual data, work-order counts, labor-category rates, and markups for a six-year period bear on the reasonableness of the costs or rates at issue in this proceeding. The information sought by Allco bears no material relevance to the evaluation of the Company's application.
ALLCO-212	(b)	Burns & McDonnell charges: for all customers, state whether any portion of Burns & McDonnell's cost is also included in the pools from which the ZGS, ZAS/AS&E, ZNP, or any other loader described in ALLCO-102, Attachment 1 is derived, and if so how double recovery from a customer-funded work order is prevented;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-212, subpart (a)
ALLCO-212	(c)	Burns & McDonnell charges: for all customers, state whether the customer is informed, in the estimate, the Interconnection Agreement, or the final accounting report, that contractor project management time will be charged to the work order in addition to the percentage overhead, and where;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-212, subpart (a)
ALLCO-212	(d)	Burns & McDonnell charges: for all customers, the agreement(s) under which Burns & McDonnell performs the functions described, including statements of work and rate schedules, which ALLCO-109 asked the Company to produce and which it did not;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-212, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-212	(e)	The Burns & McDonnell charges applied to each work order associated with the Fisk, Plainfield, Voluntown 1240, and Bilton clusters and to INT-60394, INT-90809 and INT-90811, by year.	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-212, subpart (a)
ALLCO-213	(a)	Overheads: For each calendar year 2017 through 2026, for all customers, state the percentage overhead or CIAC rate stated in the Interconnection Agreements and cost estimates issued that year (if more than one, each rate and the number of agreements at each);	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing all Interconnection Agreements and project cost documentation from 2017 to 2026 in order to locate the requested information and then using that information to create the requested analysis, which would thus be an undue burden to create. Eversource further objects to this request as unduly repetitious. In response to ALLCO-115(c), ALLCO-102, and ALLCO-003, the Company explained that it develops overhead rates annually from historical or budgeted costs and those rates are maintained by the ESC Investment Planning, Corporate Accounting, Plant Accounting and Accounts Payable departments. The Company further explained that those charges are applied to a project's direct charges, such as labor, materials and contractors, so that only projects with direct spending are eligible to receive overheads. Additionally, the Company explained it uses a "gross up" method when calculating the CIAC "tax adder" percentage. Allco's repeated requests for the same, or substantially the same information, despite having received responses, serve no legitimate purpose.
ALLCO-213	(b)	Overheads: For each calendar year 2017 through 2026, for all customers, state each instance in which a rate other than the standard rate, a waiver, or a cap was applied, the applicant (anonymized), the rate applied, the reason, and the approver by title	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-213, subpart (a)
ALLCO-213	(c)	Overheads: The basis on which the Company's December 2024 Final Accounting Reports for the Fisk, Plainfield, Voluntown 1240, and Bilton clusters reported CIAC of 12.00, 9.97, 10.19 and 11.00 percent and the Interconnection Agreement for INT-60394 states "CIAC - 16%," and whether those rates are the rates in (a) for the years in which those agreements and estimates issued	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-213, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-217	(a)	RNS/LNS Billing: For each month of calendar years 2020 through 2026 to-date, state in native format: the date and hour of the monthly peak of the local network (or other load aggregation) on which the Company's Regional Network Service charge under the ISO-New England Transmission, Markets and Services Tariff is determined, and the tariff provision that defines that peak;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information that is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without compiling the information for each month from 2020 through 2026, if possible, and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-217	(b)	See subpart (a): the Company's network load (MW) at that hour as billed for Regional Network Service, and the corresponding value billed for Local Network Service and for any transmission adjustment charge	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-217, subpart (a).
ALLCO-217	(c)	See subpart (a): the Regional Network Service rate ($/kW-month or $/kW-year) applied in that month and the resulting monthly charge in dollars, separately for Regional Network Service, Local Network Service, and each other ISO-New England or Eversource transmission charge billed on a peak-load determinant;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-217, subpart (a).
ALLCO-217	(d)	See subpart (a): the identity of the entity that computes the monthly network load (the Company, Eversource Energy Service Company, ISO-New England, or another) and the data from which it is computed;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-217, subpart (a).
ALLCO-217	(e)	See subpart (a): produce the monthly Regional Network Service and Local Network Service invoices or settlement statements for the Test Year and the workpapers that derive the billing determinant.	Fully	Materiality; Relevance; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-217, subpart (a). Please also refer to the Company's response to ALLCO-063, wherein the Company states that it does not serve load and therefore does not receive settlement statements for any load assets. Eversource further objects to this request as unduly reptitious.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-218	(a)	For each calendar year 2020 through 2025, state in native format: the date and hour of the ISO New England system-wide annual peak load used to determine capacity requirements for the following Capacity Commitment Period, and the system-wide peak load (MW) at that hour;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without compiling the information for each month from 2020 through 2026 and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.
ALLCO-218	(b)	For each calendar year 2020 through 2025, state in native format: the total load of the Company's Metering Domain at that hour as reported by the Company to ISO-New England, and the load at that hour of each Load Asset in the Metering Domain, identified by load-serving entity category (Standard Service, Last Resort Service, each competitive supplier, which may be anonymized other than by category);	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-218, subpart (a)
ALLCO-218	(c)	For each calendar year 2020 through 2025, state in native format: the Capacity Load Obligation (MW) of the Standard Service and Last Resort Service Load Assets for each Capacity Commitment Period from 2021–2022 through 2026–2027, the Forward Capacity Market clearing price applicable to the Connecticut load zone or Rest-of-Pool for each period, and the capacity cost ($) embedded in the Standard Service and Last Resort Service rates for each period;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-218, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-218	(d)	For each calendar year 2020 through 2025, state in native format: whether the Company, as the entity that procures Standard Service and Last Resort Service supply, receives from its wholesale suppliers any accounting of the capacity cost component of their bids, and if so produce it for the most recent solicitation;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-218, subpart (a)
ALLCO-218	(e)	For each calendar year 2020 through 2025, state in native format: if the Company contends that it does not possess the values in (a) through (c), identify the person at Eversource Energy Service Company or elsewhere who reports Metering Domain loads to ISO-New England and who receives the Capacity Load Obligation reports, and produce the reports for the Test Year.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because the identification of Eversource personnel involved in this ISO-NE process is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-219	(a)	For each calendar year 2016 through 2025, state in native format: the date, hour, and megawatts of the Company's annual system peak load (non-coincident), and of its monthly system peak load for each month, as measured at the Company's delivery points or as otherwise determined by the Company;	No	Publicly Available; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information that is publicly available, is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-219	(b)	For each calendar year 2016 through 2025, state in native format: the three-year average peak-demand hour for each month that the Company or its affiliates use for planning, rate design, or cost allocation, and the document in which it appears;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a)(1), 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without compiling the information for each month from 2020 through 2026 and then compiling that information to create a document with the requested analysis, which would also be an undue burden to create.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-219	(c)	For each calendar year 2016 through 2025, state in native format: the peak-load values the Company reported in each annual Forecast of Loads and Resources filed with the Connecticut Siting Council for those years, reconciled to the values in (a) and to the ISO-New England values in Q-ALLCO-218(b);	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-219, subpart (a)
ALLCO-219	(d)	For each calendar year 2016 through 2025, state in native format: whether the Company's reported peak loads are gross of, or net of, distributed generation that is not separately metered (behind-the meter generation) and distributed generation that is separately metered but treated as a load reducer, and the method by which any adjustment is made;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-219, subpart (a)
ALLCO-219	(e)	For each calendar year 2016 through 2025, state in native format: the hourly load of the Company's Metering Domain (8,760 hours), and the hourly load of the Standard Service and Last Resort Service Load Assets, for the Test Year, as reported to ISO-New England and after any resettlement.	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-219, subpart (a)
ALLCO-220	(a)	Follow-up to ALLCO-088, Attachment 1 and ALLCO-185: State in native format, for each month of 2020 through 2025: the same estimate at the hour of the Company's monthly network-load peak identified in Q-ALLCO-217(a) and at the hour of the Company's own monthly system peak identified in Q-ALLCO-219(a);	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without performing the analysis in other Allco ISO-NE requests (to which the Company objects), all of which would also be an undue burden to create.
ALLCO-220	(b)	See subpart (a): the estimated output at the ISO-New England annual peak hour identified in Q-ALLCO-218(a);	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-220, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-220	(c)	See subpart (a): the installed capacity (MW AC) of distributed generation under five megawatts in the Company's service territory assumed for each month, stated separately for generation that is behind a customer meter and generation that is separately metered, and reconciled to the 75,727 facilities and 742.5 MW reported in ALLCO-095;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-220, subpart (a)
ALLCO-220	(d)	See subpart (a): the capacity factor or production profile applied to that installed capacity for each peak hour and its source (including any ISO-New England behind the-meter photovoltaic forecast, PVWatts or PVsyst profile, or metered production data from the Company's own production meters), and why Attachment 1 reports zero output at the 18:00 and 19:00 peak hours of May through September in several years;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-220, subpart (a)
ALLCO-220	(e)	See subpart (a): whether the Company has, for any purpose, estimated the reduction in Regional Network Service or Local Network Service charges, or in Capacity Load Obligation, attributable to distributed generation in its service territory in any year since 2016, and if so produce each such estimate (ALLCO-088(e) answered only that the Company has not "expressly" done so; state whether it has done so in any other manner, including in load forecasts that net out behind-the-meter generation)	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information since 2016 that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-221	(a)	State: the retail rate component(s) through which the Company recovers Regional Network Service, Local Network Service, and other ISO-New England transmission charges billed on peak-load determinants (identify by tariff name and the schedule or exhibit in this docket, or in the most recent transmission rate adjustment proceeding, that sets the rate), and the total dollars so recovered in each calendar year 2020 through 2025;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-221	(b)	State: the retail rate component(s) through which capacity costs for Standard Service and Last Resort Service are recovered, and the total dollars so recovered in each of those years;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-221, subpart (a).
ALLCO-221	(c)	State: for each of those years, the dollar amount by which the charges in (a) and (b) would have been reduced for each 100 MW of load reduction at the applicable monthly network peaks and at the ISO-New England annual peak hour, respectively, showing the calculation;	No	Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-221, subpart (a). Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without responding to subparts (a) and (b) (to which the Company objects), which would also be an undue burden to create.
ALLCO-221	(d)	State: whether the Company agrees that, because ISO-New England procures capacity against a forecast peak and allocates capacity costs by actual coincident peak contribution, a reduction in a load-serving entity's coincident peak contribution reduces its Capacity Load Obligation by more than the reduction in load whenever cleared capacity exceeds the actual peak, and if it disagrees, explain;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-221, subpart (a).

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-221	(e)	State: whether the Company has ever presented to the Authority, in this or any prior docket, a quantification of the transmission and capacity cost reductions attributable to distributed generation in its service territory, and if so identify it by docket, date, and exhibit	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it seeks ISO-NE wholesale market-related information that is not material to the Company's distribution rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-222	(a)	Load reducer treatment: State each benefit to distribution customers that the Company contends results from treating distributed generation under five megawatts as load reducers rather than registering it as generation with ISO-New England, and the data, if any, on which the Company relies for each;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because the request analysis on benefits of load reducer treatment rather registering with ISO-NE is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-222	(b)	Load reducer treatment: State whether any of the values requested in Q-ALLCO-217 through Q-ALLCO-221 were considered by the Company in preparing the benefit-cost analyses, if any, supporting the interconnection and hosting-capacity investments proposed in this docket, and if so identify where;	No	Materiality; Relevance; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-222, subpart (a). Please also see the Company's responses to ALLCO-041 and ALLCO-088. Based on the foregoing, Eversource objects to this question as unduly repetitious.
ALLCO-222	(c)	Load reducer treatment: State whether the Company contends that the Authority may evaluate the prudence and reasonableness of those investments without data on the effect of the resources they interconnect on the transmission and capacity charges its customers pay, and if so the basis for that contention.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because the requested legal position -- from a fact witness -- as to whether PURA may conduct a prudence review on proposed investments is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. A fact witness cannot speak to a legal position.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-223	(a)	Queue Position: For distribution circuits/substations serving specific Allco projects: state, in native format, for every interconnection application of 50 kW or more received by the Company for a facility on the same circuit(s) or substation from January 1, 2015 to the present: the PowerClerk or legacy application identifier, applicant (which may be anonymized other than for the Connecticut Green Bank, its affiliates, and projects financed or owned through Green Bank programs, and other than Allco and its affiliates), nameplate capacity, and date stamp assigned under Guidelines § 2.6;	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without reviewing all interconnection applications since 2015 for the circuit(s) and substation serving specific Allco projects to gather the requested information and then use that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to the requested analysis because it seeks interconnection queue-related information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-223	(b)	See subpart (a): the dates of each study, Contingent Approval, interconnection-agreement issuance, execution by the Company, construction start, and Permission to Operate;	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-223, subpart (a)
ALLCO-223	(c)	See subpart (a): the hosting capacity of the circuit and substation as of each such date, and the upgrade cost assigned to each application;	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-223, subpart (a)
ALLCO-223	(d)	See subpart (a): each instance in which an application with a later date-stamp than an Allco-affiliate application received a study result, an interconnection agreement, or Permission to Operate before the Allco-affiliate application, and the reason;	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-223, subpart (a)
ALLCO-223	(e)	See subpart (a): whether any Green Bank-affiliated or Green Bank-financed project on those circuits was processed under a program, agreement, or priority not available to other applicants, identifying it;	No	Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-223, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-223	(f)	See subpart (a): the person(s) who made each sequencing decision.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-224	(a)	The Company has represented to the United States District Court (No. 3:26-cv-01277, ECF 46-3) that the State Board of Administration of Florida Retirement System holds 312,059 Eversource Energy shares, drawn from that fund's Form 13F-HR. State for each of the fifty largest holders of Eversource Energy common shares as of the most recent date for which the Company or Eversource Energy has data, the holder, the number of shares, and whether the holder is a public or private pension fund, an index fund, an actively managed fund, an insurance company, or other;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this subpart because the Company's filing in Allco's federal court lawsuit with respect to a Company shareholder in the state of Florida is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-224	(b)	See introduction to subpart (a). State the aggregate percentage of Eversource Energy's shares held by public pension funds, and the source;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-224, subpart (a).
ALLCO-224	(c)	See introduction to subpart (a). State the actuarial assumed rate of return of each public pension fund among those holders of which the Company or its ROE witness is aware, and the assumed long-term equity return used in Eversource Energy's own pension plans;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-224, subpart (a).
ALLCO-224	(d)	See introduction to subpart (a). State whether the Company or its ROE witness considered that the return investors require of Eversource Energy is evidenced by the return assumptions of the pension funds that hold it, and if not, why not;	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-224, subpart (a).
ALLCO-224	(e)	See introduction to subpart (a). State each service (e.g., Broadridge, DTC, NOBO lists, 13F compilations) through which Eversource Energy identifies its beneficial holders, and the date of the most recent such list.	No	Materiality; Relevance;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-224, subpart (a).

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-225	(a)	Overheads Recovered in Base Rates: State the amount of administrative and general expense, engineering and supervision, construction overhead, and other indirect cost included in the distribution revenue requirement approved in Docket No. 17-10-46, by FERC account, and the amount of each proposed in this docket	No	Unduly Repetitious Evidence	C.G.S. § 4-178(1)	Eversource objects to this request as seeking substantially the same information in a prior request. Please see the Company's response ALLCO-044 where the Company stated that capital expenditures (direct costs and overheads applied to those amounts) are entirely billed to the interconnection customer and reimbursed through the CIAC process; therefore, these asset additions are not included in rate base.
ALLCO-225	(b)	Overheads Recovered in Base Rates: State the capitalized overhead and clearing-account rates (including the engineering, supervision, administrative, and construction-overhead loaders identified in ALLCO-102, Attachment 1) in effect in each year 2018 through 2026, and the dollar amount of overhead capitalized to distribution plant in each year.	No	Unduly Repetitious Evidence	C.G.S. § 4-178(1)	See response to ALLCO-224, subpart (a).
ALLCO-225	(c)	State for each year 2018 through 2025, the dollar amount of overhead charged to interconnection customers and other customer-funded work orders through those loaders, and whether that amount was credited against the overhead pool recovered through base rates, capitalized plant, or both — identifying the account and the credit;	No	Unduly Repetitious Evidence; Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-224, subpart (a). Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing the documentation for each interconnection project completed between 2018 and 2025 to determine, for each project, the total dollar amount of overheads charged and the total those amounts for each year, which would also be an undue burden to create.
ALLCO-226	(a)	Exhibit CLP-Additions 4 Supplemental 2: For each project in that exhibit whose description or project type indicates a generator interconnection, state in native format: the gross direct cost, the customer contribution credited, each overhead or indirect loader applied (by name, rate, and dollar amount), and the resulting total cost;	No	Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able to create the requested analysis without manually reviewing the approximately 1,500 lines of data in the exhibit and then determining whether certain projects are responsive to the question, and if so, reviewing final accounting and backup documentation for each such project to gather the requested information and then compile that information for each project into the format requested, which would also be an undue burden to create.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-226	(b)	Exhibit CLP-Additions 4 Supplemental 2: For each project in that exhibit whose description or project type indicates a generator interconnection, state in native format: the amount placed in rate base and the amount of the customer contribution recorded as CIAC, by account;	No	Requires Creation of Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-225, subpart (a). Eversource further objects to this request as unduly repetitious. As the Company stated in its response to ALLCO-044, interconnection asset additions are not included in rate base.
ALLCO-226	(c)	Exhibit CLP-Additions 4 Supplemental 2: For each project in that exhibit whose description or project type indicates a generator interconnection, state in native format: whether the overhead charged to the interconnection customer on the same work order was credited against the overhead capitalized, and if not, why not;	No	Requires Creation of Analysis Not Readily Available; Overly Burdensome; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See responses to ALLCO-225, subparts (a) and (b).
ALLCO-226	(d)	Exhibit CLP-Additions 4 Supplemental 2: For each project in that exhibit whose description or project type indicates a generator interconnection, state in native format: the final accounting status of the project under Guidelines § 1.2 and the amount of any refund due or paid.	No	Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-225, subpart (a). Eversource further objects to this subpart because the true-up/final reconciliation status of projects not included in rate base and any refunds due or paid are not material to the Company's rate case application, nor are they relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-227	(a)	ISO-NE load settlement: State the method the Company does apply, step by step, including each loss factor, allocation, or estimation used, and its source;	No.	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this subpart because the analysis requested on ISO-NE load settlement is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-227	(b)	ISO-NE load settlement: the most recent distribution loss study the Company or Eversource Energy Service Company has prepared or commissioned for the Connecticut system, by title, date, and author, and produce it;	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this subpart because the analysis requested on ISO-NE load settlement is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-227	(c)	ISO-NE load settlement: the annual 2025 totals of the hourly wholesale loads in ALLCO-063, Attachment 1, for Standard Service, Last Resort Service, and competitive supply, and the annual 2025 retail kWh billed in CIEC-020, Attachment 2 — stated as numbers, not by cross-reference — and the difference;	Fully	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Please refer to the Company's response to ALLCO-152(c) and Eversource's supplement to Motion Nos. 084 & 099, Table 1 at ALLCO-152(c). Eversource fully responded to this subpart citing to where the information is in the record and that the two numbers cannot equal one another due to a variety of reasons, including but not limited to thermal losses. Eversource objects to further responding to this request because, for the foregoing reasons, the request is unduly repetitious. Eversource further objects to this subpart because the analysis requested on ISO-NE load settlement is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-227	(d)	ISO-NE settlement: the Company's best estimate of the components of that difference (technical losses, unaccounted-for energy, company use, unbilled usage, and other), with the basis for each.	Fully	Unduly Repetitious; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-227, subpart (c).
ALLCO-228	(a)	Using Legal Tracker, state in native format for the Test Year and for 2023, 2024, and 2026 year to date:for each outside counsel matter with billings exceeding $10,000, the matter number, the vendor, the amount billed, the amount charged or allocated to the Company, the FERC account, the category of matter (litigation, regulatory, transactional, employment, collections, other), and, for litigation, the forum and the adverse party's relationship to the Company (customer, developer or interconnection customer, contractor, employee, regulator, other);	No	Unduly Repetitious; Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Please refer to the Company's responses to ALLCO-019, ALLCO-033, and OCC-309. Based on the foregoing Eversource objects to responding to this interrogatory as unduly repetitious. Eversource further objects to this request because it would require the Company to create analysis beyond what it has already provided that it does not maintain in the ordinary course of business. Eversource is not able to create the requested analysis without manually reviewing Legal Tracker to determine all matters over $10,000, compiling the requested information for such matters, and using that information to create the analysis requested, which would also be an undue burden to create.
ALLCO-228	(b)	See subpart (a): the amounts in (a) billed by Day Pitney LLP, Cowdery Murphy & Healy LLC, Keegan Werlin LLP, and Steptoe & Johnson LLP for matters involving Allco or its affiliates, Windham Solar LLC, any distributed generation interconnection dispute, FERC Docket No. EL25-117-000, Civil Action No. 3:26-cv 01277, PURA Docket No. 25-03-12, or the SCEF program, by matter;	No	Unduly Repetitious; Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-228, subpart (a). Eversource further objects to this subpart because the information requested on Allco-specific matters and other program-specific and interconnection disputes is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-228	(c)	See subpart (a): whether any amount in (b) is included in the Test Year cost of service, the Rate Year revenue requirement (including through the escalation applied in Schedule C-3.20), or Exhibit CLP-REVREQ-9, and where;	No	Unduly Repetitious; Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See responses to ALLCO-228, subparts (a) and (b).
ALLCO-228	(d)	See subpart (a): if the Company contends that the Legal Tracker system cannot produce the report described in (a), the person who made that determination and the steps taken to test it.	No	Unduly Repetitious; Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-228, subpart (a). Eversource further objects to this subpart because the identification of specific Eversource personnel is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable.
ALLCO-230	(a)	For each of the following sums, state, by general-ledger account number and title, how the Company recorded the receipt, and each subsequent reclassification, of the funds; the date of each entry; whether the funds were at any time recorded as a liability to the developer, as forfeited security, as a credit to ratepayers or to the LREC/ZREC, SCEF, or interconnection cost-recovery mechanisms, or as revenue; the FERC account and rate-case schedule, if any, in which the balance appears; and the person who authorized each entry: the $257,260.19 of interconnection-cost refunds computed in the Final Accounting Reports issued in December 2024 for the Allco-affiliate projects and confirmed in the Company's January 16, 2025 correspondence;	No	Materiality; Relevance; Unduly Repetitous	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. The accounting treatment of interconnection cost refunds associated with specific Allco-affiliate projects has no bearing on the determination of the Company's revenue requirement or on whether its proposed rates are just and reasonable. The request is instead directed toward a collateral dispute between the Company and Allco, and this proceeding is not the appropriate forum for pursuing that dispute. Eversource further objects to this request as unduly repetitious. In response to ALLCO-059-SP01, the Company provided (a) funding projects and work order information, for (b) distributed generation, with (c) construction costs, (d) CIAC amounts, by (e) FERC account for the years 2018-2025. In addition, in response to ALLCO-001, the Company provided CIAC year-end balances for 2018 through 2025, as well as the FERC account used to record the CIAC activity. The present request seeks the same, or substantially the same, information that the Company has already provided. Allco's repeated submission of duplicative requests serves no legitimate discovery purpose, adds nothing to the record, and does not advance a more informed regulatory determination. Instead, it imposes an undue burden on the Company to re-address matters that have already been answered, consumes the parties' time and resources, increases the cost of participation, delays the proceeding, and undermines the administrative efficiency that the discovery process is intended to protect.
ALLCO-230	(b)	Refer to subpart (a), the $225,000 of SCEF Year 6 bid deposits posted by Allco affiliates in 2025;	No	Materiality; Relevance; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-230(a)
ALLCO-230	(c)	Refer to subpart (a), the $734,339.76 of Performance Assurance posted under the LREC/ZREC contracts terminated in 2024	No	Materiality; Relevance; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-230(a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-230	(d)	Refer to subpart (a), the $559,907.00 of Development Period Security posted under the power purchase agreements that terminated on or about July 23, 2024. Produce the ledger detail and journal entries in native format.	No	Materiality; Relevance; Unduly Repetitious	C.G.S. §§ 4-177c(a) & 4-178(1)	See response to ALLCO-230(a)
ALLCO-231	N/A	The Company conditioned the return of the SCEF Year 6 bid deposits described in Q-ALLCO-230(b) on receipt of a request on the bidder's letterhead. Identify the provision of the SCEF Program Manual, Terms and Conditions, or any tariff, order, or Company policy that imposes that condition; the person who decided to impose it and the date; every other bidder in SCEF Years 1 through 7 whose deposit refund was conditioned on a letterhead request, and the elapsed time between non-selection and refund for each; and whether any bidder other than an Allco affiliate waited more than ninety days after non-selection for the return of a deposit, identifying each.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. The Company's administrative procedures for processing bid-deposit refunds related to SCEF procurements, including those applicable to other bidders, do not affect the Company's revenue requirement or the justness and reasonableness of its proposed rates. Rather, the request appears aimed at investigating a collateral dispute between the Company and Allco. Moreover, Allco's request for information about every other bidder in SCEF Years 1 through 7 is especially remote from the issues in this proceeding. If Allco seeks to investigate allegations of disparate treatment or improper conduct regarding the return of deposits, such claims pertain to a separate procurement or contractual dispute, not a matter relevant to the Commission's determination of the Company's rates in this proceeding.
ALLCO-232	N/A	With respect to the notices of force majeure delivered on behalf of Allco projects, identify every person who received or reviewed the notices; every written response, if any, and the date; every internal communication, memorandum, or legal-department entry concerning whether to accept, dispute, or respond to the notices and whether the Performance Assurance and Development Period Security would be retained or returned; the date on which the Company first recorded or treated those sums as forfeited; and the person who made that decision.	No	Materiality; Relevance; Privilege	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to this request because it seeks information related to Allco's delivery of force majeure notices for 10 of its projects that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it seeks information on Eversource Legal communications and work product that is protected by the attorney-client and work product privileges.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-233	N/A	State the total amount of developer security, bid deposits, and interconnection-cost overpayments retained or treated as forfeited by the Company in each year 2019 through the Rate Year; the mechanism (LREC/ZREC reconciliation, SCEF reconciliation, FMCC, base rates, or other) through which each amount was credited to or otherwise reflected in rates, with the docket and schedule; whether any such amount is reflected in the revenue requirement, rate base, or reconciliation balances proposed in this Docket; and whether the Company has ever returned security or deposits after first treating them as forfeited, identifying each instance.	No	Materiality; Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome;	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the requested analysis because it is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. This repetitive request for a historical accounting exercise is disproportionate to any potential relevance to the issues in this proceeding. Moreover, the historical treatment of forfeited developer security, bid deposits, and interconnection overpayments payments addressed in other proceedings does not bear on the reasonableness of the Company's rates or revenue requirement at issue in this proceeding. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without reviewing filings in previous RAM dockets to gather the requested information and then use that information to create the requested analysis, which would also be an undue burden to create. In response to OCC-894, the Company provided the performance assurance amounts that were returned, by year. The Company also explained that performance assurance amounts which are forfeited under the terms of customer contracts or tariff agreements are listed as "sacrifices" within itemized clean energy program costs submitted for recovery through the Non-Bypassable Federally Mandated Congestion Charge and provided amounts credited as a reduction to program costs, by year. ALLCO's request for the same, or substantially the same information, serves no legitimate purpose.
ALLCO-234	N/A	Verogy Holdings testified on October 21, 2026 that the Company "insisted that no single true-up would be processed until an agreement was reached regarding all other prior projects submitted by Verogy" (Verogy Testimony at 7). State whether the Company has a policy or practice of withholding, delaying, or conditioning the final accounting or true-up of one interconnection project on the resolution of accountings for other projects of the same developer or its affiliates; identify the provision of the Guidelines, the Standard IA, or any Authority decision that authorizes that practice; identify each developer (by anonymized identifier if the Company contends confidentiality), the projects, and the periods during which the practice was applied since January 1, 2019; state whether the practice was applied to any project of Allco or its affiliates; and identify the person who approved the practice.	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because it is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Allco's requests pertain to a developer-specific commercial dispute that is neither relevant nor material to the Company's application in this proceeding. The fact that an intervenor raises a personal grievance in its testimony does not, by itself, render information related to that grievance discoverable. Allco cannot transform its rights to inspect relevant and material records into an unrestricted right to compel the Company to respond to every allegation, grievance, or theoretical dispute Allco can conjure, regardless of whether the subject has any bearing on the proceeding. The Company's discovery obligations do not extend to undertaking an investigation of collateral matters simply because Alloc wishes to pursue them.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-235	N/A	Verogy Holdings testified that Interconnection Agreements issued through 2023 stated in Appendix G that "Price is based on Impact study with an accuracy of +/- 25%," and that "more recent interconnection agreements remove this requirement" (Verogy Testimony at 11–12). State the date on which, and the Standard IA revision in which, the accuracy language was removed; identify the person who approved the removal and the reasons; state whether the removal was filed with or approved by the Authority, identifying the docket; produce each version of the Standard IA and its Appendix G in use since January 1, 2019; and state, for each year 2019 through 2026, the number of executed Interconnection Agreements whose final cost exceeded the Appendix G estimate by more than 25 percent and the aggregate amount of the excess billed to interconnection customers	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because it is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. The requested information concerning language in an Appendix to standard Interconnection Agreement is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19 to amend the Company's base-rate schedules. Allco's request pertains to a developer-specific grievance that is neither relevant nor material to the Company's application in this proceeding. The fact that an intervenor raises a personal grievance in its testimony does not, by itself, render information related to that grievance discoverable. Allco cannot transform its rights to inspect relevant and material records into an unrestricted right to compel the Company to respond to every allegation, grievance, or theoretical dispute Allco asserts, regardless of whether the subject has any bearing on the proceeding. The Company's discovery obligations do not extend to undertaking an investigation of collateral matters simply because Allco wishes to pursue them.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-236	N/A	Verogy Holdings and Earthlight Technologies testified that the Company requires a Real-Time Automation Controller ("RTAC") on projects of 500 kW and larger and bills it at approximately $75,000 to $90,000 per unit, with additional customer equipment of approximately $27,500 and studies of $22,500 or more, against a procurement cost of approximately $15,000 (Verogy Testimony at 13–14; Earthlight Testimony at 14–15). State the date on which, and the document by which, the RTAC requirement and the 500 kW threshold were adopted, and whether either was filed with or approved by the Authority; produce the Company's build-up of the per-unit charge (equipment, labor, engineering, overhead loaders, and any other component, by amount); state the number of RTAC units billed to interconnection customers in each year 2022 through 2026 and the total billed; state whether the RTAC is Company-owned plant recorded in rate base and, if so, the account and amount; and state whether the Company permits an	No	Materiality; Relevance	C.G.S. §§ 4-177c(a) & 4-178(1)	Eversource objects to the request because it is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. The information sought is not relevant or material to any issue in the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19 to amend the Company's rate schedules. Allco's requests relate to a developer-specific grievance based on an unsupported equipment cost, which the developer merely "believes" equipment should cost, and a 500 kW threshold supported in another proceeding that the developer simply disagrees with. See Decision, November 29, 2023, Docket No. 23-08-05, Annual Energy Storage Solutions Program Review – Year 3, at 23. The fact that an intervenor raises a personal grievance in its testimony does not, by itself, render information related to that grievance discoverable. Allco's offer of proof fails to establish that these issues are relevant or material to the Company's application in this proceeding and the Company objection must be sustained. Allcos right to inspect relevant and material records does not grant it carte blanche to compel the Company to respond to every allegation, grievance, or hypothetical dispute it raises, regardless of relevance to the proceeding. The Company's discovery obligations do not encompass investigating collateral issues merely because Allco wishes to pursue them, nor do they require addressing every conceivable grievance Allco may assert.
ALLCO-237	(a)	For each proposed SHARE investment state, in native format: the estimated direct cost of labor, materials, contractors and equipment;	Fully	Unduly Repetitious	C.G.S. § 4-178(1)	The Company has fully answered this question through its responses to ALLCO-056 and ALLCO-131. As stated in ALLCO-131(b), Eversource has not completed detailed engineering, design, or cost estimating for potential system modifications associated with the identified substations. Accordingly, the Company cannot provide additional project-specific cost information beyond what was previously provided. Eversource objects to further responding to this question as unduly repetitious.
ALLCO-237	(b)	For each proposed SHARE investment state, in native format: each overhead, loader, adder or clearing-account allocation included in the estimate (including the ZNP, ZPB, ZGS, ZST, ZLO, ZMI, ZAS, ZEL/ZEB and ZVE loaders described in ALLCO-102, Attachment 1, and any A&G, engineering, supervision, AFUDC or contingency component), with the rate and dollar amount of each	Fully	Unduly Repetitious;	C.G.S. § 4-178(1)	See response to ALLCO-237, subpart (a)

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-237	(c)	For each proposed SHARE investment state, in native format: the resulting total; and reconcile the totals to the $47.6 million requested for the TSP term and the approximately $275 million total program cost.	Fully	Unduly Repetitious;	C.G.S. § 4-178(1)	See response to ALLCO-237, subpart (a)
ALLCO-238	N/A	State the formula by which the fixed $/kW fee to be charged to DER participants in a SHARE group solution is, or will be, derived; state whether the fee is computed on the gross estimated cost of the group solution (including the overhead loaders identified in response to Q-ALLCO-237) or on direct cost only; state whether the fee is subject to final accounting or true-up against actual cost; and produce each workpaper, presentation or memorandum in which the fee methodology has been developed or presented to PURA, DEEP, the Interconnection Customer Coalition or any stakeholder group.	No	Unduly repetitious	C.G.S. § 4-178(1)	Eversource objects to this request as unduly repetitious. This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-011 (providing the formula used to derive the $/kW fee); ALLCO-012; ALLCO-014 (explaining that new or pending applications in SHARE target areas would have the option to participate in the SHARE Group Study that determines the Group Solution ***and associated SHARE fee)*** ; ALLCO-56 (providing an analysis of the cost allocation for specified projects); and ALLCO-176, which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate discovery purpose, unnecessarily duplicates discovery, does not meaningfully advance the record, does not promote a more informed regulatory determination, and imposes an undue burden on the Company to repeatedly address the same matters. Rather, it unnecessarily consumes the parties' time and resources, increases the cost of participation, delays the proceeding, and undermines the administrative efficiency that discovery procedures are intended to preserve. The administrative process should not be held hostage to ALLCO's insistence on asking the same questions over and over again.
ALLCO-239	N/A	State the accounting entries the Company proposes for amounts paid by DER participants under SHARE — identifying the FERC account(s) to be credited (including whether such amounts will be recorded as contributions in aid of construction credited against plant in Accounts 101/106, as customer advances in Account 252, as revenue, or otherwise), the timing of each entry, and whether such amounts will be reflected in the Company's rate base, revenue requirement or any reconciling mechanism in this proceeding or any subsequent rate proceeding; and state whether the same accounting is applied today to interconnection customer payments for system modifications and network upgrades	No	Unduly repetitious	C.G.S. § 4-178(1)	Eversource objects to this request as unduly repetitious. This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-011; ALLCO-012; ALLCO-014; ALLCO-56; and ALLCO-176, which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate purpose, unnecessarily duplicates discovery, and imposes an undue burden on the Company to repeatedly address the same matters. See also Eversource response to ALLCO-238, above.

Interrogatory No.	Subpart	Information Sought	Answered	Objection Type	Legal Authority	Additional Information/Analysis
ALLCO-240	N/A	For each SHARE investment, state the portion of the estimated cost the Company proposes to place in rate base and earn a return on (the "capital project cost component" referred to in OCC-583), the portion to be funded by DER participants, and the basis for the allocation; state whether DER participant payments will reduce the plant balance on which the Company proposes to earn a return before the plant is placed in service, and if not, why not; and state whether any overhead or administrative cost included in the participant-funded portion is also recovered from all customers through base rates, identifying the cost-of-service schedule and amount	No	Unduly repetitious	C.G.S. § 4-178(1)	Eversource objects to this request as unduly repetitious. This request is substantially duplicative of prior requests issued by Allco, including, but not limited to ALLCO-011i; ALLCO-012ii; ALLCO-014iii; ALLCO-56iv; and ALLCO-176v, which sought substantially the same information and to which the Company has already responded. The repeated submission of substantially identical requests serves no legitimate purpose, unnecessarily duplicates discovery, and imposes an undue burden on the Company to repeatedly address the same matters. See also Eversource response to ALLCO-238, above.