STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**DOCKET NO. 26-05-10**
	:	**October 26, 2026**

CONNECTICUT INDUSTRIAL ENERGY CONSUMERS
EIGHTH SET OF INTERROGATORIES

The Connecticut Industrial Energy Consumers ("CIEC") requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P," or "Eversource") to the following interrogatories in the above-captioned proceeding by **November 9, 2026**. If there are any objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct, and complete copies of the original document.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and

accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody, or control of the responding party's directors, officers, employees, representatives, or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production requests you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody, or control, or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

INTERROGATORIES

The following interrogatories are directed to Edward A. Davis and Kimberly R. Parsons (the "Rates Panel"):

CIEC-31. With reference to the Company's response to OCC-929:

a. Did the Panel review the "requirements and documentation set forth as part of UI's current EDR program" when developing the proposal it advanced in this proceeding for an economic development rate ("EDR") incentive? If the answer is in the affirmative, explain how such review informed the Panel's

proposals. If the answer is in the negative, explain why the Panel did not review that information.

b. Specify the basis on which Eversource anticipates that UI will file a new rate case in 2028.

c. Explain in detail information regarding the UI EDR that the Panel anticipates reviewing in Docket No. 28-08-08. Include in your response an explanation of why information that a different utility might file in a future rate proceeding is relevant to the development of an EDR for certain Eversource customers in this proceeding.

CIEC-32. With reference to the Panel's response to OCC-930:

a. On what basis does the Panel assume that a decision that may be issued in Docket No. 28-08-08 will include regulatory objective standards applicable to the Eversource EDR? Explain your answer in detail.

b. Explain in detail why the decision to be issued at the end of UI's next electric rate proceeding is relevant to the development of an EDR for Eversource to implement in this proceeding.

CIEC-33. In its responses to OCC-459, OCC-929, OCC-930, and OCC-931, the Panel provided additional information regarding how the EDR in its direct testimony should be implemented. Explain in detail why the Panel did not include this information in its direct testimony.

CIEC-34. In its response to OCC-929, the Panel states that Eversource "anticipates a written commitment and demonstrated achievement of added jobs and capital investments within the Company's service area, commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR."

a. Explain in detail how Eversource would determine if the number of added jobs and/or capital investment is "commensurate with the level of service and nature of the new or expanded facilities that would receive service under the EDR."

b. Is the Panel proposing that a customer must commit to adding a specific number of jobs as a condition of eligibility for the EDR? If the answer is in the affirmative, specify the minimum number of jobs that would have to be added.

c. Is the Panel proposing that a customer must commit to investing a specific amount of capital as a condition of eligibility for the EDR? If the answer is in the affirmative, specify the minimum level of capital investment that would be necessary.

CIEC-35. With reference to the Panel's response to OCC-457, does the Panel agree that a customer can be eligible for the EDR even if the new or incremental load that receives the incentive does not result in material "downward pressure on rates" for all customers? Explain your response in detail and, if the Panel does not agree, specify the minimum reduction in rates for all customers that the Panel is proposing to adopt as a condition on EDR eligibility.

CIEC-36. With reference to the Panel's response to OCC-464, explain whether:

a. The term "large-scale computational loads" includes only data centers, or if it also may be applied to other non-residential loads.

b. There are specific criteria that Eversource uses to define what constitutes a "data center"? If the answer is in the affirmative, provide and explain the criteria.

CIEC-37. The Panel stated in its response to OCC-930 that "[t]he requirements set forth as part of the decision and EDR implemented pursuant to UI's rate case in PURA Docket No. 28-08-08 provide another basis for regulatory objective standards applicable to the Eversource EDR."

Does the Panel agree that the EDR for new and incremental load, and the special contract policy for load retention, that PURA approved for UI implementation in Docket Nos. 22-08-08 and 24-10-04 provide a basis for regulatory objective standards applicable to the Eversource EDR? If the answer is in the affirmative, identify the standards from Docket Nos. 22-08-08 and 24-10-04 that are applicable to the Eversource EDR and specify how they are reflected in the EDR proposed by the Panel. If the answer is in the negative, explain why the PURA decisions issued in Docket Nos. 22-08-08 and 24-10-04 do not provide such basis.