Date Filed: October 27, 2026

Witness: Craig Dikeman and Matthew J. Correia
Request from: ALLCO

Question:

(Follow-up to ALLCO-024, ALLCO-026, and ALLCO-033 — Legal Tracker.) ALLCO-024 states that Eversource Legal "uses the Thomson Reuters Legal Tracker ('Tracker') electronic billing system to receive, review and process for payment all outside counsel invoices and budgets for individual matters," and ALLCO-024, Attachment 1, requires every invoice to carry the "Legal Tracker Matter #" and "Eversource Matter Name," a matter budget, and a monthly per-matter estimate of unbilled fees for the unvouchered-liabilities report.

(a) Produce from Tracker, for each matter to which any fee or disbursement was charged to the Company (directly or through ESC allocation) in 2024, 2025, and 2026 to date: the Legal Tracker Matter #, Eversource Matter Name, law firm, matter type, opening and closing dates, approved budget, and fees and disbursements invoiced and paid by year, in native format and under the protective order if the Company contends the matter names are confidential.
(b) State whether the Company contends that generating the report in (a) from Tracker is not "commercially reasonable" (ALLCO-033), and if so state the hours and cost the Company estimates it would require and the basis for the estimate.
(c) Identify each matter in (a) for which a Matter Management Plan was required under Section D of Attachment 1 (matters in excess of $250,000 or otherwise significant) and produce each such Plan and budget.
(d) ALLCO-026 states that "the rate case work performed by Keegan Werlin LLP in Connecticut was subject to competitive bidding": identify the solicitation, its date, the firms invited and responding, the evaluation criteria and scoring, the person(s) by title who selected the firm, and the resulting engagement terms and rates, and produce the solicitation, the proposals, and the selection memorandum.
(e) ALLCO-026 states that "strategic legal services" are not subject to competitive bidding or sole-source justification under the Procurement Manual: quote the provision, define "strategic legal services," identify who determines whether an engagement qualifies, and state whether the engagements of Day Pitney LLP, Cowdery Murphy & Healy LLC, Steptoe LLP, and the Law Offices of Alexander G. Snyder reflected in ALLCO-033 were treated as strategic legal services and, for each, the reason.

Response:

a. The Company has prepared a Legal Tracker Legal Invoice Report for representative sample of three law firms: Cowdery & Murphy, Day Pitney and Keegan Werlin that perform state regulatory legal services for years 2023 through 2025. The Company could not produce this detailed information from the Legal Tracker billing system for all 74 legal service vendors in the time allowed.

b. The Company could not produce this detailed information from the Legal Tracker billing system for all 74 legal service vendors in the time allowed

c. The Company will not produce any Matter Management Plans for legal matters included in the legal service expenses due to these legal matter management plans contain attorney client privileged work product and legal guidance.

d. Please refer to the Company's response to ALLCO-027[i].

e. Please refer to EOE-046, Attachment 1, through EOE-046, Attachment 21, for the current version of the Eversource Procurement Manual. The section number may vary from version to version in the Procurement Manual. The following language was taken from latest version of the Procurement Manual, provided in EOE-046, Attachment 21.

> "3.2 All procurement transactions by Eversource and its companies for Normal Goods and Services are subject to the requirements of this Manual, with the following exceptions…Strategic Legal, Government Relations, Human Resource and Benefits and Treasury/Credit/Financing Services"

The Procurement Manual does not separately define "Strategic Legal Services." The term generally refers to legal services for which the selection and management of counsel involve legal strategy, professional judgment, subject-matter expertise, continuity of representation, or other considerations appropriately managed by the Legal Department. The Company's Legal Department management determines whether an engagement falls within the strategic legal services exception and, in collaboration with Procurement as appropriate, determines whether Procurement may add value by conducting or supporting a competitive solicitation.

Prior Referenced Response:

[i] ALLCO-027 Question:

With respect to the approximately $3.1 million of rate case expense included in the proposed revenue requirement (Exhibit CLP-REVREQ-1; response to REVREQ-9), including the approximately $1.875 million estimate for Keegan Werlin LLP: (a) produce the engagement letter(s), fee agreement(s), rate schedules, and any budget or estimate for each outside firm and consultant included in rate case expense; (b) state the amounts billed and paid to date, by firm; (c) state whether the Company considered performing any of the rate case legal work with its internal legal function or solicited proposals from any other firm, and if not, why not; and (d) explain how the Company determined that the estimated amounts are reasonable for recovery from ratepayers.

ALLCO-027 Response:

(a) Refer to the following attachments for the engagement letter for rate case services:

- ALLCO-027, Attachment 1 CONFIDENTIAL, for Keegan Werlin LLP bid proposal.
- ALLCO-027, Attachment 2 CONFIDENTIAL, for Keegan Werlin LLP engagement letter notifying KW its bid was accepted.
- ALLCO-027, Attachment 3, for a listing of contracts with outside firms and consultants included in rate case expense
- ALLCO-027, Attachment 4 CONFIDENTIAL, for contracts listed in Attachment 3
- ALLCO-027, Attachment 5 CONFIDENTIAL, for contracts listed in Attachment 3

(b) Refer to ALLCO-027, Attachment 9, for the summary billed by vendor through June 2026.

- See also ALLCO-27, Attachment 10 CONFIDENTIAL, for Keegan Werlin invoices through May 31, 2026.

(c) The Company considered the capabilities of its internal staff to perform the rate case legal work when making decisions whether to seek outside service providers. The decision was made to utilize internal staff for a portion of rate case work and to solicit proposals for an outside vendor to assist with the other portion of rate case legal work.[i]. The Company does not maintain sufficient internal legal resources to fulfill the substantial work requirements of the ongoing typical workload of both CL&P and Yankee Gas Services Company d/b/a Eversource Energy, while also tending to high demand, unusual proceedings like a base rate because these types of proceedings occur at irregular intervals.

Therefore, the Company's legal staff contacted law firms that either had experience with utility rate matters or have attorneys on staff with rate making or rate case experience. The Company issued a request for proposal ("RFP") to three law firms for assistance with legal services for the rate case, presented in ALLCO-27, Attachment 6.

The responses to this RFP are provided in ALLCO-27, Attachment 7 CONFIDENTIAL, and ALLCO-027, Attachment 8 CONFIDENTIAL. See also ALLCO-27, Attachment 1 CONFIDENTIAL.

The Company selected Keegan Werlin because of its specialized expertise and resources in handling base-rate proceedings, its prior experience working with the Company, the large volume of legal work associated with a rate-case proceeding and Keegan Werlin's staffing to handle that work; the existing workload of in-house legal staff; and the firm's competitive pricing.

(d) The Company is aware of the requirement to contain costs for outside services providers and has taken steps to ensure costs are negotiated to the lowest levels possible while still receiving the highest quality of service. Initially, when the decision was made to use an outside service provider, the Company competitively bid these services as described above. Once an outside service provider is selected, the Company limits the total contract costs through mechanisms such as blended hourly fees, discounts and not-to-exceed levels.

Additionally, as discussed above, the rate case requires a large volume of legal work from highly experienced and specialized legal staff. All of this work is relevant and necessary to the preparation and presentation of the Company's rate case proceeding.