Date Filed: November 13, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(RAM POSITIONS) O'Brien and Murray Pre-Filed Test., pp. 71 and 143-147; Application, Sch. WP C-3.5. Regarding the incremental positions currently recovered through the Rate Adjustment Mechanism (RAM) that the Company proposes to roll into base distribution rates:

a. Identify each position by title, employer (CL&P or EESCO), RAM component and program supported, and provide, in an unlocked Excel worksheet with formulas intact, for each position the Test Year payroll, benefits and payroll taxes, the total annual amounts recovered through the RAM in 2021 through 2025, and the amount included in the RAM rates effective May 1, 2026.

b. Identify which of the positions are included in the 1,417 CL&P and 4,493 EESCO active and filled positions and which are not, and for each position identify the schedule and line on which the Rate Year cost appears and the amount.

c. Provide Attachment 1 of the Company's response to Interrogatory CAE-036 in Docket No. 26-01-03, Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company, referenced in footnote 11 of the testimony and reconcile positions therein to those identified in the response to subpart a. above.

d. Explain how the Company will prevent recovery of the same positions through both RAM and base distribution rates for any period after June 30, 2027, given that RAM rates effective May 1, 2027, will include an estimate of these costs for January 1 through June 30, 2027, to be trued up in rates effective May 1, 2028. State the RAM revenue requirement for these positions for each RAM rate period from January 1, 2027, through the final true-up.

e. For each position described in footnote 11 of the testimony that recorded a portion rather than all of its time to the identified programs, state the portion of payroll recovered in base distribution rates and the portion recovered through RAM in each of calendar years 2021 through 2025, and explain how the Company prevented recovery of the same time through both.

Response:

a. Please refer to RRU-182 Attachment 1.

b. All positions are included in the total of 4,493 ESC active and filled positions. Rate year costs associated with these positions are included in the total amount on SFR Schedule C-3.5, line 24.

c. Please refer to RRU-182 Attachment 1. All positions reflected in the Company's interrogatory response CAE-036 in Docket No. 26-01-03 are included within RRU-182, Attachment 1.

d. As the question indicates, the Company will have some level of recovery for the positions detailed in RRU-182 Attachment 1 for the period January through June 2027 through the ratemaking methodology used in the RAM, when those rates are set for effect on May 1, 2027. In accordance with the current RAM process, the Company includes estimates for current year costs that are trued up in the next year's RAM process. Consistent with this requirement, the Company will include an estimate of the January 1 – June 30, 2027 FTE costs in RAM rates effective May 1, 2027 through April 30, 2028. The Company will then true up the actual FTE costs for the period January 1 – June 30, 2027, in rates effective May 1, 2028 through April 30, 2029, which will be the final true-up for these specific FTEs. Lastly, the RAM revenue requirement for these positions will not be known until the Company files its RAM rates on February 15, 2027.

e. Please refer to RRU-182 Attachment 1, identifying whether a position is currently recovered in the base distribution rate. As RRU-182 Attachment 1 demonstrates, no part of any of the positions described in Exhibit CLP-REVREQ-1, at 146, fn.11, of the testimony are recovered in the base distribution rate.

The amount of time each employee spent in support of each program is based on actual 2025 activity. Labor levels used to set base distribution rates reflect only the addition of CL&P employees since 2017, and only through 2020. All employees included in RRU-182 Attachment 1, are employed by ESC, which has increased employment from 2,875 to 4,493 since base distribution rates were last set pursuant to the Settlement Agreement in Docket No. 17-10-46. Substantial growth in mandated clean energy programs such as those supported through the RAM have been a contributor to the growth in ESC's employment. Many employees listed in RRU-182 Attachment 1, were hired within departments funded outside of base distribution rates, such as Energy Efficiency. Other employees listed in RRU-182 Attachment 1, with hire dates prior to 2018 either: (1) have been transferred into newly created positions with new employees backfilling their prior positions; or (2) record their actual time working in support of clean energy programs that have materially impacted the responsibilities of their organization (e.g. billing). These details are all reflected within RRU-182 Attachment 1.