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August 27, 2026

VIA ELECTRONIC FILING

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules – CL&P's Response to OCC's Comment on Motion No. 36

Dear Attorney Gaudiosi:

On behalf of the Connecticut Light and Power Company d/b/a Eversource Energy (the "Company" or "CL&P"), this letter responds to recent correspondence to the Public Utilities Regulatory Authority ("PURA") from the Office of Consumer Counsel ("OCC"), dated August 27, 2026, which comments on the Company's Motion No. 36, requesting a small extension for certain discovery responses. In OCC's Comment, the OCC does not object to the Company's requested extensions, but rather the OCC claims that Motion No. 36 is "form over substance" and that "[f]or years state parties have lamented how regulated entities manipulate the Authority's motions practice to their advantage…."

The Company wants to make it eminently clear that there is no "manipulation" intended or achieved, but rather the Company is simply striving to adhere to an orderly administrative process documenting the need for, and timing of, filing extensions. Despite OCC's lamentations, the Company's performance to date on discovery filings has produced 33% of the Company's responses to OCC interrogatories *prior to the due date* and with 94% of the Company's responses to OCC interrogatories on time. Only 6% of the Company's responses to OCC's interrogatories have come later than the initial due date.

For all interrogatories from all parties, the Company has filed 22% of its responses prior to the due date, 91% on time, and 9% later than the initial due date. These statistics are reflected in the table below, presented through today's date, August 27, 2026.

Accordingly, the data shows that CL&P is making every reasonable effort to provide responses as quickly as possible, while ensuring the responses are accurate and complete, with all necessary personnel input, review and sign-off. Eversource personnel have already worked

extended hours, including evenings and weekends, to meet discovery deadlines on highly detailed and complex interrogatories, recognizing the importance of providing responses to the State Parties to enable and support the procedural schedule established by PURA.

AS FILED STATS					
Set	**Due**	**Quantity Issued**	**Filed Early**	**Filed On Time**	**Filed Late**
OCC-01	8/11/2026	101	48	52	1
OCC-02	8/13/2026	50	12	37	1
EOE-01	8/21/2026	118	1	94	19
CIEC-01	8/18/2026	15	0	15	0
OCC-03	8/28/2026	62	26	28	1
EOE-02	8/21/2026	13		9	
PURA-01	8/21/2026	1		1	
OCC-04	8/25/2026	112	8	53	13
EOE-03	8/26/2026	6		1	5
OCC-05	8/26/2026	29		9	
CLF-01	8/27/2026	11			
OCC-06	8/28/2026	2			
OCC-07	8/31/2026	12			
OCC-08	9/1/2026	14			
AMTRAK-01	9/1/2026	5			
PURA-02	9/2/2026	5			
OCC-09	9/3/2026	26			
ALLCO-01	9/4/2026	19			
CIEC-02	9/8/2026	1			
OCC-10	9/8/2026	38			
Total - Discovery Issued		**640**	**95**	**299**	**40**
	Total Filed	**434**			
	% Filed Early	22%			
	% Filed Early/On-Time	91%			
	% Filed Late	9%			
OCC Discovery Issed		**446**			
Total OCC Discovery Filed		**289**			
	% Filed Early	33%			
	% Filed Early/On-Time	94%			
	% Filed Late	6%			

* Please note that "Filed Late" reflects responses for which the due date has been extended past the initial due date.

When interrogatories are issued in a PURA proceeding, the issuer decides when to issue questions; how many questions to issue at once; and what the due date is, with most issuers adhering to a 14-day due date for response, regardless of the complexity or number of questions issued. When interrogatories are issued to CL&P, the Company relentlessly strives to meet the due date with accuracy and completeness of its answers. As soon as interrogatories are issued, CL&P undertakes a process of analyzing and distributing the typically numerous questions and their subparts. After this triage process, the Company can identify some questions that are readily apparent as likely taking longer than two weeks to answer. At that point, the Company endeavors to request extensions only on those questions. The Company then works over the next 14 days to compile the other responses by the due date. The Company's goal is to file every answer complete, correct, and on time. However, this aspiration cannot always be achieved.

As the Company approaches the two-week due date, unexpected contingencies and issues can arise. On the due date for any given response, the Company may still be trying to confirm numbers, obtain approvals and push responses through. Sometimes all of that cannot be completed by the close of business. From the Company's perspective, it makes more sense to take another day or two to reach a complete and accurate answer than to file an incomplete, inaccurate or otherwise unverified response. When it becomes apparent that certain responses will not be finalized for filing by close of business, CL&P has to make the decision to hold the filing, and when it makes that decision, it prefers to document that decision with the filing of a motion for extension presenting the reasons that additional time is needed, and for which responses. Following this protocol creates a record of the travel of various responses in relation to the applicable deadlines.

In Motion No. 36, CL&P filed a motion for extension to create an administrative record of when responses were initially due and when the Company anticipated it would be able to file. In filing this motion, the Company is informing the interrogatory issuer of the situation, out of courtesy, and to see if they have a response that can be reflected in the motion. When the interrogatory issuer cannot be reached, it does not cure the circumstance that more time is needed for certain interrogatory responses, and therefore the Company needs to submit its motion.

The Company views this approach of filing a motion as a way to provide a clean administrative record under current PURA practices. However, the Company is open to considering suggestions for an alternative process, such as filing a notice instead of a motion, once it is clear that certain responses cannot be filed that day. The Company's only interest is to maintain a clear administrative record.

CL&P encourages OCC and other parties to contact the Company's counsel if they have a question or a perceived concern about the filing process and any information CL&P is submitting in the rate case. CL&P welcomes such outreach from parties. Calling or e-mailing CL&P's counsel in such circumstances could potentially avoid or reduce the number of times another party raises perceived concerns with PURA, which promotes administrative efficiency and would contribute to a collegial atmosphere within Connecticut's energy regulatory bar.

Please contact me if there are any questions with respect to this filing.

Very truly yours,



Tiffany N. Tisler

cc: Service List