Date Filed: October 08, 2026

Witness: Douglas P. Horton, Brendan J. O' Brien, Garrett J. Murray, Leanne M. Landry, and Jeffrey D. Turano
Request from: ALLCO

Question:

(Follow-up to ALLCO-032 and ALLCO-001.) For customer deposits and for each category of interconnection-related funds the Company holds — deposits and security provided by developers and interconnection customers, amounts paid for interconnection studies, amounts paid for system modifications and upgrades held pending final accounting, and unpaid or unrefunded final-accounting balances — identify exactly where the funds sit: (a) each bank, depository, escrow, trust, money-market, or investment account in which such funds are held or through which they pass, stating the financial institution, account title, account number (which may be provided under the protective order in this docket), account type, and the entity in whose name the account is maintained (the Company, Eversource Energy Service Company, Eversource Energy, or another affiliate); (b) whether the funds are segregated from the Company's general corporate funds or commingled with them, including whether they participate in or fund the Eversource system money pool; (c) the interest or investment return earned on each such account or on the commingled funds, and to whom that return is credited; (d) if the funds are commingled, how the Company uses them — working capital, money-pool lending to affiliates, or otherwise — and the return realized on that use; and (e) a reconciliation of the amounts so held to the FERC accounts and balances identified in the Company's responses to ALLCO-001 and ALLCO-032, including FERC Account No. 252500.

Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company states as follows:

a. – d. Any cash provided to CL&P would be deposited into its primary operating account at Bank of America (Account number ending 9048) with those funds coming led with all other funds in that account for working capital needs. CL&P is no longer a party to a money pool arrangement with other affiliates. Interest is not earned on this primary operating account, but an earnings credit is netted against our monthly account transaction fees. Additionally, as noted in the Company's

response to ALLCO-084[i], the Company does not hold any interconnection-related funds associated with deposits and/or securities by developers and interconnection customers.

e. The responses to ALLCO-001[ii] and ALLCO-032[iii] are referencing two different accounts. The response to ALLCO-001 refers to the CIAC balances in FERC account 252500, whereas the response to ALLCO-032 refers to the Customer Deposit balances in FERC account 235010.

Prior Referenced Responses:

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[i] ALLCO-084 Question:

(Follow-up to ALLCO-032.) The table provided as ALLCO-032, Attachment 1, addresses subpart (c) only as to "Customer Deposits." Complete the response as to the remaining categories the interrogatory identified: for (a) deposits, prepayments, and security provided by developers and interconnection customers (including amounts paid for interconnection studies, system modifications, and upgrades held pending final accounting), (b) unpaid or unrefunded interconnection final-accounting balances, and (c) over-recovered rate adjustment mechanism balances held prior to return to customers — state, for each: the amounts held as of December 31, 2025 and as of the most recent date available; the interest rate the Company pays or credits on each (or confirm that the rate is zero); the accrual and compounding convention; and the FERC account(s) in which each is recorded. If the Company pays or credits no interest on any category, state the basis for accruing carrying charges at its pre-tax WACC, compounded monthly, on balances customers owe the Company while paying nothing on balances the Company holds for customers.

ALLCO-084 Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company notes that interconnection-related funds are not held in customer deposits. Please refer to the Company's responses to ALLCO-002[i] and ALLCO-044[i]. Further, the Company does not and has not requested deposits, prepayments or security from developers and distribution generation interconnection customers.

[ii] ALLCO-001 Question:

Identify each FERC account in which the Company records CIAC and other amounts collected from interconnection customers for interconnection studies, upgrades, and overheads, and state the balance in each such account at the end of each year 2018 through 2025 and as of the most recent month available.

ALLCO-001 Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company records CIAC activity from interconnection customers to FERC Account No. 252500. The table below summarizes the end of year balance in FERC Account No. 252500 from 2018 through June 2026.

Year	**Balance**
December 2018	($5,569,769)
December 2019	($5,038,280)
December 2020	($9,076,090)
December 2021	($25,399,399)
December 2022	($11,263,859)
December 2023	($7,796,182)
December 2024	($10,334,276)
December 2025	($23,605,408)
June 2026	($28,277,769)

[iii] ALLCO-032 Question:

With respect to every carrying charge, return on unamortized balance, or similar time-value amount the Company proposes to collect from customers in this docket — including the approximately $396.7 million of carrying charges on 2018-2023 storm costs and $27.6 million on 2024-March 2025 storm costs (Exhibit CLP-REVREQ-2 (Storms A) and (Storms B)), carrying charges on deferred assets, and carrying charges proposed on RAM, decoupling, and SCRAF over/under-recoveries: (a) state the rate applied, whether it is pre-tax or after-tax, the compounding convention, the date from which carrying charges accrue, and the balance to which the rate is applied (including whether the balance is net of customer contributions, insurance recoveries, and amounts disallowed in any docket); (b) identify the statute, regulation, or PURA decision authorizing each (Allco does not repeat OCC-522, which addresses the choice of index for SCRAF carrying charges); and (c) separately identify every context in which the Company holds funds of customers or third parties — including customer deposits, developer and interconnection-customer deposits and security, unpaid interconnection refunds, and over-recovered rate adjustment mechanism balances — and state the interest rate the Company pays (or credits) on each, so that the rates the Company charges when it is owed money can be compared with the rates it pays when it owes money.

ALLCO-032 Response:

Please refer to ALLCO-032, Attachment 1, for the requested information. Please refer to the Company's response to OCC-522.