Date Filed: October 08, 2026

Witness: Andrew C. Belden and Justin Pelkowski
Request from: ALLCO

Question:

(Follow-up to ALLCO-041.) The components below require no counterfactual and are in the Company's possession. Provide, for each calendar year 2020 through 2025, in native format: (a) the Company's reported Real-Time Load Obligation, by month; (b) the Company's monthly coincident-peak (12-CP) values used for RNS, LNS, and TAC billing; (c) the Company's capacity load obligation and installed capacity requirement values; (d) the estimated or metered aggregate output of distribution-connected resources under five megawatts at each monthly system peak hour — including any behind-the-meter generation estimates or profiles the Company or its affiliates use in load forecasting, standard service procurement, or ISO-NE load reporting (including any ISO-NE behind-the-meter photovoltaic estimates the Company relies on); and (e) each document in which the Company or any affiliate has estimated the effect of behind-the-meter or load-reducing generation on peaks, load obligations, or transmission billing determinants. If the Company contends it possesses no data responsive to subpart (d), state whether output at peak could be derived from its PowerClerk records, production meters, or forecasting models, and why it has not done so.

Response:

PURA's June 2, 2026, Notice of Proceeding in Docket No. 26-05-10 states that, upon a receipt of a completed application from Eversource to amend the Company's existing rate schedules, PURA will conduct a contested proceeding to review Eversource's application. Eversource objects to Allco's effort to litigate an issue that is outside the scope of this rate case proceeding. Considering the statutory 350-day timeframe to issue a final decision on the Company's application and the number of interrogatories issued in this proceeding to-date, the litigation of issues irrelevant to the Company's application threatens to adversely impact the orderly conduct of this proceeding.[1]

Without waiving said objection,

(a) Please refer to the Company's response to ALLCO-063[i].

(b) Please refer to CIEC-020, Attachment 1.

[1] Allco previously litigated the Millstone PPA in the Company's Docket No. 24-01-03 Revenue Adjustment Mechanism proceeding. See, Docket No. 24-01-03, Eversource responses to ALLCO-02, ALLCO-03, ALLCO-05, ALLCO-06, ALLCO-07, and ALLCO-21. Eversource objected to each of these questions.

(c) Because the Company does not serve load it does not have capacity obligations.

(d) Refer to ALLCO-088, Attachment 1, for estimated output of distribution-connected resources under five megawatts at each monthly ISO-NE peak hour.

(e) The Company has not expressly estimated the effect of behind-the-meter or load-reducing generation on peaks, load obligations, or transmission billing determinants.

Prior Referenced Response:

---

[i] ALLCO-063 Question:

For each month of the Test Year, produce the ISO New England settlement statements (including any resettlements) for the Company's load asset(s), showing the kilowatt-hours of Real-Time Load Obligation charged or settled to the Company, and state the monthly and annual settled kilowatt-hour totals. Reconcile the annual ISO-NE settled kilowatt-hours to

a) the total retail kilowatt-hours billed to all customers (Q-ALLCO-061) and

b) the kilowatt-hours billed to standard-service customers (Q-ALLCO-062),

separately itemizing and quantifying each reconciling item — including distribution losses, transmission losses, unaccounted-for energy, company use, station service, unbilled or estimated usage, and any other category — and stating the loss factor(s) applied at each stage and their source. Identify the system(s) and process by which the Company performs retail load settlement, and identify (by title, date, and custodian) every internal load-settlement, unaccounted-for-energy, or loss-study report prepared or updated for any period including the Test Year.

ALLCO-063 Response:

The Company does not serve load and therefore does not receive settlement statements for any load assets. In addition, wholesale loads for Standard Service, Last Resort Service and retail supply are not relevant to the adjudication of the Company's proposed retail distribution revenue requirement in this rate case or retail customer loads. Nevertheless, for informational purposes please refer to ALLCO-063, Attachment 1, for the 2025 ISO-NE wholesale loads for Standard Service, Last Resort Service, and competitive supply.

In addition to the fact that the above-described wholesale loads are not relevant to the adjudication of the Company's proposed retail distribution revenue requirement in this rate case or retail sales, the Company also notes that it cannot readily reconcile wholesale load data with Test Year data due to rate class level data being based on monthly billing cycles at the customer meter, which vary for every customer, and wholesale load data being calendar month, summed by hour, and aggregated by competitive supplier at the wholesale level.