Date Filed: September 14, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Warren R. Boutin, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

State whether refund obligations owed by the Company to interconnection customers following final accounting or reconciliation of interconnection projects ― including the $257,260.19 in refunds identified in the Company's December 2024 Final Accounting Reports for the Fisk, Plainfield, Voluntown 1240, and Bilton clusters ― are recorded as liabilities on the Company's books; identify the account(s), the total balance of such unpaid refund obligations at the end of each year 2022 through 2025, and state whether and how such balances are reflected in rate base, cash working capital, or the revenue requirement in this docket.

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, please refer to the Company's response to ALLCO-002[i] for "whether and how such balances are reflected in rate base, cash working capital, or the revenue requirement in this docket." The Company confirms that when a refund obligation is owed to interconnection customers following final accounting or reconciliation of interconnection projects, the refund obligation is recorded as a liability on the Company's books until the payment is issued to the interconnection customer.

Prior Referenced Response:

[i] ALLCO-002 Question

State the total dollar amount of CIAC and interconnection-related payments collected from DER and QF interconnection customers in each year 2018 through 2025, and explain precisely how those amounts are reflected in (a) rate base, (b) the Test Year revenue requirement, and (c) the Rate Year revenue requirement proposed in this docket, identifying the specific schedules and workpapers.

ALLCO-002 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, please refer to the Company's response to ALLCO-001 for CIAC year-end balances from 2018 through 2025. CIAC and interconnection-related payments received by the Company reduce the cost of construction or plant placed in service. CIAC is recognized as an offset to the underlying capital project. CIAC would not be considered a component of rate base until the underlying capital project is placed in service. At that time, the underlying capital project costs in rate base would be wholly offset by CIAC at the time of final project billing and reconciliation. In the Company's next cost of service update, the rate base and the Rate Year revenue requirement will reflect the CIAC and the underlying capital project cost for projects placed in service.