STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: APPLICATION OF THE	**:**	
CONNECTICUT LIGHT AND POWER	**:**	**DOCKET NO. 26-05-10**
COMPANY D/B/A EVERSOURCE	**:**	
ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**SEPTEMBER 16, 2026**

CONSERVATION LAW FOUNDATION AND ACADIA CENTER JOINT FIRST SET OF INTERROGATORIES

Conservation Law Foundation ("CLF") Acadia Center request responses from the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company") to the following interrogatories in the above-captioned proceeding by September 30, 2026. If there are objections to any questions, or if providing responses to any questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct, and complete copies of the original document.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody, or control of the responding party's directors, officers, employees, representatives, or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

F. Where an Interrogatory asks to provide all documents please provide all data, assumptions, schedules, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of live unlocked Microsoft Excel spreadsheet files with all cell references/links and formulae intact.

G. Each Interrogatory to provide all documents or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

H. If the Company finds any request to be ambiguous, please notify Conservation Law Foundation through their counsel so the request can be clarified prior to the preparation of a written response.

I. If information requested is not available and cannot be made available in the exact form requested, provide such information or documents as can be made available that best respond to the request.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production requests you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody, or control, or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

INTERROGATORIES

Interrogatories CLF-AC-1 through CLF-AC-12 are directed to the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company").

CLF-AC-1: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1 (Frayer Direct Testimony), page 60.

(a) Please confirm whether the Company's proposed Performance-Based Multi-Year Rate Plan ("PBMRP") differs from the mechanisms adopted in the Proposed Final Decision issued July 14, 2025 in Docket No. 21-05-15RE01 ("RE01 2025 PFD").

(b) Referencing the Company's answer to CLF-AC-1 (a), identify and describe each respect in which the PBMRP differs from the mechanisms adopted in the RE01 2025 PFD.

(c) For each identified mechanism difference provided under CLF-AC-1 (b), please identify confirm or deny that the whether the Company evaluated considered proposing the mechanism in its proposed PBMRP as originally adopted in the RE01 2025 PFD. If the Company did evaluate whether or not to propose the mechanism as originally set forth in RE01 2025 PFD, instead of as

proposed in this Docket, please provide any written discussions, written analyses, workpapers, or other documentary materials used in making that determination.

CLF-AC-2: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, page 42.

(a) Please confirm whether the Company is proposing in Docket 26-05-10 the Revenue Cap Formula proposed in the RE01 PFD, which applies to the Company's total revenue requirement (both capital and O&M).

(b) Please confirm whether under the Company's proposal referenced in CLF-AC-2(a), the X-factor is applied only to OM&A costs, while capital costs are adjusted based on actual capital placed in service.

(c) Please confirm whether the Company considered proposing a revenue cap applied to its total revenue requirement. If so, please produce written discussions, written analyses, workpapers, or other documentary materials used in making that decision.

(d) If the Company did not consider proposing a revenue cap applied to its total revenue requirement, please explain why it did not do so.

CLF-AC-3: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, pages 69-71.

(a) Please confirm whether the capital funding mechanism proposed in Exhibit CLP-PBR-1 is the same asor different from the K-Bar mechanism the Company proposed in Docket No. 21-05-15RE01. If there are differences, please identify with specificity each difference.

(b) State whether the capital funding mechanism proposed in Exhibit CLP-PBR-1 is the same as, or different from the CT-Bar mechanism described in RE01 2025 PFD. If it is different, please identify with specificity each difference.

(c) Please confirm whether or not the Company considered proposing the CT-Bar mechanism as described in the RE01 2025 PFD. Please produce written discussions, written analyses, workpapers, or other documentary materials used in making the decision to utilize or not utilize the CT-Bar mechanism.

CLF-AC-4: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, pages 69-71.

(a) Please confirm whether or not the Company's proposed capital funding mechanism includes any return on investment (i.e., weighted average cost of capital) on capital additions during the PBMRP term prior to a prudency determination in a subsequent rate case.

(b) If the answer to CLF-AC-4(a) is yes, quantify the amount of return on investment included in the Company's requested revenue requirement for each Rate Year attributable to capital additions that have not yet been found prudent. Please provide all workpapers used to determine this amount.

(c) Explain whether this treatment in CLF-AC-4 (a) and (b) is consistent with the RE01 2025 PFD's declaration that the CT-Bar "does not include any return on investment ... on the incremental CT-Bar plant additions (as stated in Docket No. 21-05-15RE01, Proposed Final Decision, July 2025, at pages 36-37)" until a prudency finding.

CLF-AC-5: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, pages 58-59.

(a) Please confirm that the Company did not propose the S-Factor / stretch factor methodology to align with the mechanism as described in the RE01 2025 PFD to include the Benchmarking-Study-based tiered approach under which "highly efficient utilities have an S-Factor at zero.(as stated in Docket No., Proposed Final Decision, July 2025, at page 22)"

(b) Please confirm whether or not the Company considered proposing that methodology. If so, produce all analyses, benchmarking studies, models, workpapers [etc] reflecting that consideration.

CLF-AC-6: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, pages 66-68.

(a) For each of the nine priority outcomes established in the Docket No. 21-05-15 Phase 1 Decision, confirm whether the Company's proposal adopts, modifies, or omits the corresponding Metric, Scorecard, or performance incentive mechanism (PIM) identified in the RE02 Proposed Final Decision (2025) and the RE02 Proposed Final Decision No. 2 (2026).

(b) For each Metric, Scorecard, or PIM that the Company modified or omitted, state each reason for the modification or omission.

CLF-AC-7: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, page 66.

Is the Company proposing a System Reliability PIM as proposed in the RE02 Proposed Final Decisions that includes the downside-only structure and the methodology of measuring Blue-sky SAIDI and Blue-sky SAIFI against a fixed five-year historical average plus one standard deviation? If the System Reliability PIM is not proposed as described in the RE02 Proposed Final Decisions, please explain why.

CLF-AC-8: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, page 66.

Is the Company proposing a Customer Reliability PIM as set forth in the RE02 Proposed Final Decisions that includes the upside-only structure and the repeat-customer CEMI-5/CELID-6 composite score methodology? If the Customer Reliability PIM not proposed as described in the RE02 Proposed Final Decisions, please explain why.

CLF-AC-9: (Performance-based Regulation) Refer to Exhibit CLP-PBR-1, page 67.

Please confirm whether or not the Company's penalty allocation methodology was modeled on any PIM structure proposed in the RE02 Proposed Final Decisions.

CLF-AC-10: (Performance-based Regulation) Refer to Docket No. 26-05-10, CLP Rate Case Table of Contents.

Please confirm whether or not the Company filed a Comprehensive Integrated Distribution System Plan Filing, as that term is used in the RE03 Proposed Final Decisions. If the answer is no, please explain why the Company decided not to file in this docket.

CLF-AC-11: (Performance-based Regulation) Refer to Exhibit CLP-TSP-3.

(a) Please confirm whether or not the capital planning document reflected in Exhibit CLP-TSP-3 uses a five-year horizon, rather than the ten-year Capital Investment Plan horizon and the ten-to-twenty-five-year Long-Term Strategic Plan horizon proposed by the RE03 Proposed Final Decisions.

(b) Please confirm whether or not the Company evaluated adopting either the ten-year Capital Investment Plan horizon or the ten-to-twenty-five-year Long-Term Strategic Plan horizon. If the company did consider adopting either of these "horizons" please produce written discussions, written analyses, workpapers, or other documentary materials used in its evaluation.

(c) If the Company did not adopt either the ten year or twenty-five year horizons discussed above, please explain why it did not do so.

CLF-AC-12: (Performance-based Regulation) Refer to Exhibit CLP-TSP-1, Table of Contents, Section II ("State of the CL&P Distribution System").

(a) Please confirm whether or not the load forecast underlying Exhibits CLP-TSP-1 and CLP-TSP-3 includes the three scenarios (low, middle/baseline, high) proposed by Section III.C.6 of the RE03 Proposed Final Decision No. 2.

(b) Please confirm whether or not that load forecast underlying Exhibits CLP-TSP-1 and CLP-TSP-3includes the specific 90/10, 50/50, and net-adjusted-energy forecasts proposed by Section III.C.6 of the RE03 Proposed Final Decision No. 2.

(c) If the answer to subpart (a) or (b) is no, please identify with specificity each respect in which the Company's load forecast differs.

Respectfully submitted,

/s/Dave Sherry
Senior Attorney
Michaud Law Group LLC
515 Centerpoint Drive Suite 503
Middletown, CT 06457
Phone: 860-338-3728
Email: dsherry@mciahud.law
CT Juris #: 438926

CERTIFICATE OF SERVICE

This is to certify that on September 16, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served via electronic mail upon all parties designated on the Authority's official service list in the applicable proceeding in accordance with R.C.S.A. § 16-1-15.

/s/ Dave Sherry

Dave Sherry
Michaud Law Group LLC