STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

September 25, 2026
Docket No. 26-05-10

Re: Docket No. 26-05-10 - Application of CL&P dba Eversource Energy to Amend its Rate Schedules

Enclosed are interrogatories **EOE-330 through EOE-376** directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company"). The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) Office of Education, Outreach, and Enforcement (EOE) in connection with the above referenced docket, and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **4pm on October 09, 2026**. If a response to any of the requested information has already been filed in response to another interrogatory response in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

EOE requests that all interrogatory responses be included in the same document, rather than responses to each interrogatory being filed as individual documents.

Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to Electronic Filing on the Authority's website for more information. **Paper filings will be accepted only if a person is unable to file electronically. The Authority reserves the right to request paper copies of certain filings at a later date.** No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by email using the following directions: confidential material must be emailed directly to **Jeff.Gaudiosi@ct.gov** in an email with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed publicly.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion, a proposed protective order and nondisclosure agreement must be appended to the Motion. The Authority will rule on the Motion forthwith, and give further direction as necessary. Contact the Authority's Executive Secretary at (860) 827-1553 with questions regarding making a confidential filing.

The current service list for this docket is available on the Authority's website located at www.dpuc.state.ct.us/DPUCservlist.html.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

The following Interrogatories, designated as EOE-330 through EOE-376, are directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company").

EOE-330. (MEDICAL AND FINANCIAL HARDSHIP DOCUMENATION) Provide all Company policies and procedures regarding the length of time ("timeline" between a customer or physician submitting their medical protection and financial hardship verification documentation and when the customer's account is coded? If the Company does not have a written policy, please explain why.

EOE-331. (MEDICAL AND FINANCIAL HARDSHIP DOCUMENATION) Does the Company track the length of time between its receipt of a customer's required financial hardship verification and medical protection certification documentation and the placement of the applicable hardship and medical protection designation on the customer's account? Provide these statistics by month for January 2020 through December 2025. If the Company is unable to provide these statistics, please explain why.

EOE-332. (MEDICAL AND FINANCIAL HARDSHIP DOCUMENATION) If a customer's account has not received the appropriate designation within the Company's standard timeframe identified in response to EOE-330 after receipt of the required verification documentation, what steps does the Company take to remedy this situation?

a. Does this process differ if a customer is already terminated during that delay caused by the Company? If so, please provide the applicable policy or procedure.

EOE-333. (INFORMATION TECHNOLOGY) Does the Company track the number and topic of the IT-related complaints received from customers through its customer service department?

a. If so, provide this the number of complaints received by topic, if able, for each month of the test year and how they were reported (i.e., chat, phone call, email, etc.).
b. If not, please explain why.

EOE-334. (INFORMATION TECHNOLOGY) Does the Company maintain a record of IT-related complaints from one customer over a long span of time and IT-related complaints from multiple customers regarding the same issue?

a. Please provide all policies and procedures regarding the Company's record of these types of complaints.
b. If the Company treats these complaints differently, please explain those differences and explain why the Company's policy is different.

c. If the Company does not maintain a record of long-term and multi-customer IT complaints, please explain why.

EOE-335. (INFORMATION TECHNOLOGY) Please explain how the Company escalates IT-related customer complaints to its IT department. Provide all applicable internal protocols and written procedures.

EOE-336. (INFORMATION TECHNOLOGY) How does the Company inform customers about a widespread IT issue that may impact multiple customers?

EOE-337. (INFORMATION TECHNOLOGY) Is there a certain criterion that an IT issue must meet to be communicated to a large group of customers? If so, provide the criteria.

a. Is there a threshold number of customer reports, contacts, or occurrences after which the Company classifies an issue as a broader IT issue? If so, identify that threshold and explain how it is applied. Please explain the process from identifying an IT issue to customer notification. Provide all related policies and procedures outlining this process and associated metrics.

EOE-338. (INFORMATION TECHNOLOGY) If a customer contacts the Company to report the same IT-related issue on several occasions, how is this handled?

EOE-339. (INFORMATION TECHNOLOGY) Who determines if an IT-related customer complaint should be escalated to IT for further review or intervention?

a. Provide the job title and description of the position for the person(s) responsible for this determination.
b. Provide all training materials and internal policies provided to this employee(s) pertaining to this determination.

EOE-340. (INFORMATION TECHNOLOGY) When an issue is flagged by a CSR (or determining employee) regarding a customer who contacted them, what is the process for the handoff to IT?

a. Provide the job title and description of the position for the person(s) responsible for receiving this information.
b. Provide all training materials and internal policies provided to this employee(s) pertaining to this handoff.
c. Identify scenarios in which an issue would be handed off to IT that was previously identified by a customer.

EOE-341. (INFORMATION TECHNOLOGY) When a customer contacts the Company to report an issue regarding their service address, how does the Company resolve this issue? For example, if a customer contacts the Company to report an outage and is unable because their service address is recorded incorrectly. If the customer later contacts the Company about this issue, how does the Company proceed in resolving the discrepancy?

a. Is there an internal process that flags possible incorrect address?

EOE-342. (CREDIT AND COLLECTIONS) How does the Company determine what accounts are sent to a collection agency?

a. Is there a certain threshold in arrearages that an account must reach before it is sent to collections?
b. Is there a maximum length of time that an account remains past due that would trigger an account to be sent to collections?
c. Does the Company have internal policies that pertain to collections? If so, provide those.

EOE-343. (CREDIT AND COLLECTIONS) How does the Company's IVR system route calls from customers with outstanding account balances?

a. Does the IVR system automatically flag incoming calls from phone numbers associated with accounts that contain an arrearage and pass them through to Credit and Collections?
b. If the above is correct, if a customer with an arrearage is contacting the Company to report an outage, discuss account changes, or other related issues that do not pertain to Credit and Collections, how are they routed to the proper department within the IVR system?
    i. Is then the customer pushed back into the IVR loop once they get off the phone with the Credit and Collections department?

EOE-344. (CREDIT AND COLLECTIONS) Please explain how write-offs, uncollectibles, and sending accounts to collection agencies all interact with each other.

EOE-345. (RECONNECTION) Provide all internal policies or procedures that pertain to same day reconnections.

EOE-346. (RECONNECTION) What is the process for same day reconnections when a customer submits medical protection documentation? Is that process different for customers who receive medical protection hold on their account? If yes, please explain how.

EOE-347. (RECONNECTION) What is communicated to customers when they reach out to customer service for same day reconnections?

a. Are customers made aware that they pay a same day reconnection fee?
   i. Identify the fees and what they are associated with.
b. Are customers made aware of any potential reasons for a delay after a same day reconnection is issued?
c. List reasons the Company may delay a same day reconnection.
d. What restrictions does the Company have in place when it comes to same day?
   i. Is there a specific cut-off time for when same day reconnections are no longer available to the customer?
e. Are CSRs taught to offer same day reconnections if available?
   i. If yes, provide the applicable scenarios and the training material provided to the CSRs on this topic.

EOE-348. (RECONNECTION) What is the Company's policy if the CSR offers a same day reconnection and the technician does not make the appointment to reconnect?

EOE-349. (RECONNECTION) If the customer pays a same day reconnection fee, are they moved higher up on the priority list for dispatch (i.e., above people who were scheduled prior to the date)?

a. How does the company triage same day reconnections versus reconnections scheduled a day or more prior?
b. Does a same day reconnection fee guarantee the customer will be reconnected that day?
   i. If not, is the customer refunded the same day reconnect fee?
   ii. If not automatically refunded, explain the circumstances under which the fee is retained when same-day reconnection is not completed.
c. Please explain how the Company confirms that a same day reconnection fee should be charged and the customer was reconnected on the same day as their request.

EOE-350. (RECONNECTION) Provide an unlocked Excel spreadsheet containing the following information for the 2025 test year:

a. The total number of same day reconnections offered to customers;
b. The total number of same day reconnections completed;
c. The total number of same day reconnections which were not completed; and
d. For each same day reconnection that was not completed, identify the reason it was not completed.

EOE-351. (RECONNECTION) Provide an unlocked Excel spreadsheet containing the following information for the 2025 test year:

a. Total number of reconnections completed;
b. Total number of reconnections appointments that were missed because of the Company;
c. Average length of time between reconnection appointment scheduled and reconnection being fulfilled;
d. The shortest length of wait time between reconnection appointment scheduled and reconnection being fulfilled;
e. The longest length of wait time between reconnection appointment scheduled and reconnection being fulfilled; and
   i. Provide the rationale behind the wait time.

EOE-352. (TERMINATION) Please provide the following information for each month of the 2025 test year:
a. The number of customers whose service was terminated on a Friday;
b. The number of customers whose service was terminated on a holiday (other than a Friday or during the weekend);
c. The number of customers whose service was terminated the day before a holiday (other than a Friday or during the weekend); and
d. The number of customers whose service was terminated on a Saturday or Sunday.

EOE-353. (TERMINATION) If a customer is terminated on Friday, the day before a holiday, or a holiday, how does the Company remedy the situation?

a. Does the Company have any internal policies or procedures to prevent this? If so, please provide them.
b. Is the customer expected to pay the reconnection fee when the Company incorrectly terminated their service?
c. If the Company terminates service, is there a process that may mark a reconnection as urgent and expedite the reconnection process?
   i. Please provide any policies or procedures regarding this process.

EOE-354. (CUSTOMER CALLS) Refer to the call labeled CL&P_8_12_25_Hour 7_Call 2 submitted in response to EOE-1.

a. The customer mentions a previous call with the Company. Provide a copy of this call.
b. Provide all notes taken by the CSR on the account associated with the previous call and the call referenced above.

EOE-355. (OUTAGE REPORTS) How long from the time a customer reports an outage over the phone does it take for the reported outage to be included on the Company's outage map?

a. Does this differ if the customer reports the outage directly on the Company's website?

EOE-356. (OUTAGE REPORTS) If a customer, using their established service address, is unable to report an outage because the map says their address does not exist how can the customer report their outage? Furthermore, please explain how the Company's outage map may not recognize an established service address.

EOE-357. (PAYMENT ARRANGEMENTS) For the 2025 test year, provide an unlocked Excel spreadsheet containing the following statistics for residential customers:

a. Total number of residential customers enrolled in an 18-month payment arrangement;
b. The total arrearage for all the accounts enrolled;
c. The average monthly payment required for all enrolled;
d. The number of customers successfully completing the 18-month arrangement;
e. The number of customers completing the 18-month arrangement with additional arrearages accrued; and
f. The average additional arrearage accrued upon successful completion of the 18-month arrangement.

EOE-358. (PAYMENT ARRANGEMENTS) For each residential customer enrolled in an 18-month payment arrangement during the test year of 2025, provide an unlocked Excel spreadsheet containing the following statistics:

a. The month and year that arrangement began;
b. Whether the customer completed or failed off the arrangement;
c. The month and year the arrangement was completed or failed;
d. The monthly payment required;
e. The customer's total arrearage at the start of enrollment;
f. The customer's total arrearage at the time of completion or failure of the arrangement;
g. The total dollar amount paid by the customer during their enrollment in the arrangement; and
    i. The customer's average monthly bill during their enrollment in the arrangement.

EOE-359. (ARREARAGES) Provide an unlocked Excel spreadsheet, without using customer-identifying information, with the following information for all non-residential customers who currently have an arrearage:

a. The account's service start date;
b. From 2023 through the test year of 2025, the delinquent balance (if any) associated with the account as of the December bill of each year;
c. Identify the account's current status (active or terminated);
d. From 2023 through the test year of 2025, the customer's average monthly bill for each respective year;
e. From 2023 through the test year of 2025, the total amount the customer was billed for each respective year;
f. From 2023 through the test year of 2025, the total amount the customer paid for each respective year;
g. If the account was ever eligible for termination, provide the rationale as to why the account remained active.
h. If the account was terminated, provide the length of the termination before the customer was reconnected.

EOE-360. (NON-EXCLUSIVE USE) What is the process when a customer reports potential non-exclusive use to the Company?

EOE-361. (NON-EXCLUSIVE USE) If a property owner receives a letter regarding non-exclusive use and remedies the situation, how does the company verify this?

EOE-362. (NON-EXCLUSIVE USE) Once a property owner remedies the non-exclusive use and the Company verifies the necessary work has been completed, what is the Company's policy if that same customer reports non-exclusive use again?

a. If this occurs more than twice, what is the Company's policy on next steps?
b. Provide all relevant Company policies and procedures, including any documentation provided to CSRs regarding how they should respond if a customer indicates that non-exclusive use is at issue.

EOE-363. (COMPETITIVE BID ASSESSMENTS) Refer to Responses to EOE-162 and EOE-167. The Company's response to EOE-162 identified controls that monitor adherence to the Company's Delegation of Authority (DOA) policy. Additionally, the Company's response to EOE-167 referenced a 2025 RFP that was issued. Respond to the following:

a. Provide documentation demonstrating the contemporaneous review of the 2024 spend aggregation both detailing the aggregate Hartford Elevator LLC spending and the conclusions reached. If contemporaneous documentation doesn't exist, explain why.
b. Provide a copy of the referenced RFP and the corresponding results.
c. Explain why the Company did not pursue an RFP until 2025 when the vendor was used since at least 2021.

EOE-364. (VEGETATION MANAGEMENT PROGRAM) Refer to Response to EOE-151. The interrogatory requested the Company to "provide the cost benefit analyses the Company performed for determining reliability projects for the 2025 Test Year"; however, no such BCA was provided.

a. Provide the 2024 Reliability Budget Optimization Tool (ReBOT) referenced in the response, along with the 2023 BCA.
b. Explain how the BCA was incorporated into the ReBOT and, if necessary, provide an exhibit demonstrating how the BCA inputs were used.

EOE-365. (VEGETATION MANAGEMENT PROGRAM) Refer to Response EOE-140. The Company's response identified that "operating under the current approved budget has more recently resulted in a reduction of local tree crews needed to complete the annual VMP workplan, which impacts the availability of local tree crews for storm response activities and the need to secure non local tree crews for Level 5 events." Explain what specific actions the Company has performed to secure local tree crews in advance of storm activity. For example, has the Company attempted to solicit services from local tree crews who are not contracted for the Company's blue-sky Vegetation Management Program. As part of the response, identify when the Company has performed any specific actions.

EOE-366. (PBMRP CAPITAL SUPPORT MECHANISM-CALCULATIONS) Refer to Response to EOE-156, Att.1-Att.2. Respond to the following:

a. Please identify the specific tabs that were responsive to the F-Factor calculation request versus those that provided additional analysis.
b. Confirm that the PBR-7 Going-In Capital RR tab was used to derive the weighted cost of capital (WACC) and that adjustments to this tab (i.e., notably cell G81) would dynamically change the F-Factor allowance within the PBR-3 F-Factor Summary tab. If not confirmed, explain how to input adjustments to account for changes to the WACC to allow for analysis of the results.
c. Please modify the F-Factor Excel spreadsheet to calculate the F-Factor as of Day 1 of Rate Year 1 where capital additions within the revenue requirements are cut-off as of an estimated end of the evidentiary record

date and the corresponding F-Factor capital additions commence as of the next month.

EOE-367. (PBMRP CAPITAL SUPPORT MECHANISM) Refer to Response to EOE-156, pp. 10-12. The Company's response argues that the proposal will require O&M savings of $29 million by Rate Year 4 to achieve the authorized rate of return (pp. 10-11) and then details an assumption of "v. O&M cost pressure is assumed to be 1% greater than inflation, annually" (p. 12). All else equal, confirm that the $29 million amount was driven by the O&M assumption within the broader revenue cap formula and was not driven by the F-Factor proposal. If not confirmed, provide the updated analysis excluding the O&M assumption (i.e., assume O&M costs equal inflation) and separately discuss why there would be a shortfall driven by the proposed F-Factor.

EOE-368. (F-FACTOR; PROPERTY TAXES O&M) Confirm that both the Company's proposed F-Factor calculation and the proposed revenue cap formula calculation increase the revenue requirements for property taxes. If confirmed, provide an analysis detailing the estimated property tax increase that would result within the revenue cap formula for each of the four Rate Years. As part of the increase, please account for the impact of the gross earnings tax (GET) and allowance for uncollectible amounts (i.e., the 7.63% and .63% included within the PBR-3 F-Factor Summary tab). If not confirmed, explain how the property tax expense would be excluded from the revenue cap formula to include the corresponding reduction in the property tax basis used after accounting for depreciation.

EOE-369. (F-FACTOR; DEPRECIATION) Refer to Response to EOE-156, Att.1-Att.2, PBR-4 F-Factor tab, cells C48 and C49. Explain what the two depreciation percentages represent (i.e., 2.906% and 3.735%) and identify how either percentage agrees to the Company's depreciation study. If they don't agree to the depreciation study, explain why.

EOE-370. (F-FACTOR; PRUDENCE TIMING) Refer to Response to EOE-156, pp. 7-9. The Company's discussion in subsection B.6 references that "the Company's F-Factor proposal does not circumvent prudence reviews." Discuss when the Company's proposal accounts for the prudence reviews to occur. For example, would the determination of prudence be required prior to the annual rate increase or does the proposal include a claw-back for the revenue impact on capital additions that are determined to be imprudent at a later date (e.g., during the next rate case). Additionally, identify when the Company would provide supporting documentation to demonstrate prudence.

EOE-371. (F-FACTOR; TARGETED SYSTEM PERFORMANCE PLAN) Refer to Response to EOE-156, Att.1-Att.2. The Company's F-Factor Excel spreadsheet (PBR-4 F-Factor tab) details monthly Plant Additions, Retirements, and Cost of Removal and cites "Exhibit CLP-ELP-1, Figure 7, annual figure divided by 12 less COR" and "Per Company Financial Forecast". Additionally, the PBR-6 Capital Expense Forecast tab details similar annual information by category. Please provide the underlying information used to derive the cited Figure 7 and the Financial Forecast. As part of the response, provide a detailed listing of all planned capital additions, the anticipated in-service date, the total amount per addition, the category, and any additional details available to assist in understanding the nature and timing of the planned capital additions. This request also attempts to understand the level of information available for parties to assess if the planned capital additions within the TSP are adequately substantiated for both necessity and anticipated cost.

EOE-372. (TIMING OF ANNUAL FILINGS; F-FACTOR) Provide both a discussion and a visual representation of the timeline detailing key components of the Company's proposed annual filings for each year of the MRP. As part of the response, identify the cutoff date(s) for capital additions, the annual filing date(s), and rate change date(s). This request attempts to understand the amount of time needed for the Company to close its books and prepare the filing, along with the amount of time for the Authority's approval, and the Company's subsequent processing of the rate increases within its system. Additionally, this request attempts to understand relevant cutoff dates whereby the F-Factor capital additions would be applicable from the end of the evidentiary record through the first annual cutoff date.

EOE-373. (F-FACTOR; COST OF REMOVAL/RETIREMENTS) Respond to the following:

a. Compare and contrast the Company's incorporation of cost of removal and retirements to the approach used in RAM filings for the Electric System Improvements (ESI) mechanism.

b. Discuss whether cost of removal is included within the Company's Targeted System Performance (TSP) plan, including the corresponding projections. If included, discuss how the projections were derived and cite relevant references to this topic.

c. If response to subsection (b) is negative, explain how the Company derived the projected cost of removal amounts within its Financial Forecast and provide supporting workpapers for the proposed amounts referenced in the F-Factor Excel spreadsheet within the PBR-4 F-Factor tab.

EOE-374. (F-FACTOR; CAPITAL ADDITIONS) Refer to Response to EOE-156, Att.1-Att.2. Explain how the F-Factor calculation and the Company's Targeted System Performance (TSP) plan accounts for unplanned capital additions.

EOE-375. (F-FACTOR; CT-BAR DIFFERENCES) Refer to Response to OCC-09, p.10. The response identified three major impairments of the CT-Bar that were addressed within the proposed F-Factor. Specific to the 3rd item (i.e., "the mechanical deduction of depreciation expense from plant additions instead of rate base"), explain why the Company believed this to be an impairment given that the Authority's PFD had applied the revenue cap formula to the going in rates, not the O&M expense as proposed by the Company. As part of the response, confirm that the Authority's proposed treatment (i.e., within the PFD) would prevent increased revenue from property taxes and the corresponding impact from GET and uncollectibles, which are otherwise included in the revenue cap formula on O&M. If not confirmed, explain how the F-Factor calculation eliminates the increases resulting within the revenue cap formula.

EOE-376. (3RD PARTY DAMAGES) Explain how the Company identifies, tracks, estimates, and records damages caused by 3rd parties that could involve reimbursement from the 3rd party or their insurance carriers. As part of the response, please provide all applicable policies, procedures, or other guidance that details the administration of this process and separately identify the specific accounting entries that would result.