Date Filed: October 05, 2026

Witness: Justin Pelkowski
Request from: ALLCO

Question:

Quantify, or produce the data sufficient to quantify, the wholesale cost reductions realized by licensed third-party suppliers by reason of load-reducer treatment for each calendar year 2020 through 2025, stated separately for: (a) energy the reduction in suppliers' settled load valued at applicable locational marginal prices; (b) capacity — the reduction in suppliers' capacity load obligations valued at applicable capacity prices; (c) regional transmission — the reduction in the coincident-peak determinants underlying RNS, LNS, and TAC charges attributable to load served by suppliers; and (d) reserves and ancillary services; and state, for each category, whether any statute, regulation, tariff, or contractual mechanism requires third-party suppliers to pass those savings through to their retail customers or to compensate the host customers whose generation produced them. If no such mechanism exists, so state.

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, it is not possible for the Company to produce the data required to quantify the alleged wholesale-cost reductions claimed by this interrogatory. The Company is unaware of any statute, regulation, tariff, or contractual mechanism that requires third-party suppliers to pass any potential savings that may result due to load reducers associated with customers taking retail supply from the supplier through to those retail customers.

[1] Allco previously litigated renewable energy projects as load reducers in the Company's Docket No. 24-01-03, Revenue Adjustment Mechanism proceeding. See, Docket No. 24-01-03, Eversource responses to ALLCO-04, and ALLCO-027. Eversource objected to both of these questions.