Date Filed: October 05, 2026

Witness: Justin Pelkowski
Request from: ALLCO

Question:

State whether the Company has ever analyzed, tracked, estimated, or reported — internally, to ISO-New England, to the Authority, or otherwise — the division of load-reducer benefits between (a) the Company's standard service and supplier-of-last-resort customers and (b) third-party suppliers and their customers; identify and produce each such analysis or report; and state whether the Company has taken any action to measure, capture, credit, or claim — for its standard service customers, for the host customers whose generation produces the savings, or for ratepayers generally — the value that accrues to third-party suppliers from load-reducer treatment, and if it has taken no such action, state each reason why not.

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, to the best of Eversource's knowledge the requested data is not analyzed, tracked, estimated or reported on and there is no action for the Company to take.

[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.