Date Filed: October 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

In correspondence dated August 5, 2025, the Company's counsel identified, by application number, the interconnection projects whose cost reconciliation remained open: Fisk (INT-29241, INT-29243, LEG-22714), Plainfield (LEG-22710, LEG-22995), Voluntown (INT-29207, INT-29208, INT-29209), and Bilton (LEG-22750, LEG-22751, LEG-22752). The same day, Allco requested "the general ledger and the backup support for each project that supports each expenditure." That request has now been outstanding for more than thirteen months, and no response to date — in correspondence or in this docket — has produced transaction-level substantiation; the Company has provided summary cost tables only. For each project and work order associated with each application number listed above: (a) produce the complete general ledger transaction detail — every journal entry or cost transaction charged to the project or work order — showing transaction date, FERC and internal account, amount, description, source system or module, cost element or resource type, and vendor or employee-group identifier, in native (Excel) format; (b) produce the source records supporting each charge: third-party invoices, purchase orders, contractor payment applications, materials issue records, and internal labor-cost or timesheet summaries (employee names may be redacted; positions by title should be retained); (c) for every overhead, loader, or other indirect amount included in the charges, state the percentage or rate applied, the base to which it was applied, the cost pool from which the rate derives, and the schedule or workpaper in which that pool's actual costs are recorded; and (d) reconcile the general ledger total for each project to (i) the amounts invoiced to and paid by the applicable interconnecting customer and (ii) the amounts reflected for that project in the Company's December 2024 final accounting reports. The Authority's record shows the Company producing invoice-, receipt-, and timesheet-level substantiation of its storm costs in response to OCC and EOE discovery in this docket as a matter of course; the same granularity is requested for charges the Company billed to, and collected from, interconnecting customers.

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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's Application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.