Date Filed: October 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

With respect to the November 20, 2020 written communication from the Company's interconnection function to Allco stating that the "current actual 'overhead' amount is showing around $100,500 versus an original estimate of $253,876" for the LEG-22713 account and projecting a refund of approximately $125,000: (a) identify each person who prepared, reviewed, or received that communication or the analysis underlying it; (b) state where in the Company's books the projected refund was recorded — the account, the amount accrued, and the date — or state that it was not recorded and why; (c) describe each action taken between November 20, 2020 and December 2024 with respect to the difference between actual and estimated overheads on that account, identifying who took or decided each action; and (d) if no true-up, adjustment, or refund occurred during that period, state each reason why not and identify each person who so decided.

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.