Date Filed: October 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

Identify every analysis, comparison, study, report, or communication from 2017 through the present — other than the November 20, 2020 communication and the December 2024 Final Accounting Reports — in which the Company, ESC, or any contractor compared the actual costs of interconnection administration, engineering, or overheads to the estimated or percentage-based amounts billed to interconnecting customers, whether for a single project or in the aggregate. For each, state its date, author, recipients, and conclusion, and produce it. If no such analysis exists, state so affirmatively.

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.