STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

TEN FRANKLIN SQUARE
NEW BRITAIN, CONNECTICUT 06051

TELEPHONE
(860 827-2900
VOICE AND TDD
WWW.CT.GOV/OCC

Kimberly White
Direct Dial: (860) 827-2695
Email: kimberly.white@ct.gov

August 5, 2026

Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, Connecticut 06051

Re: Docket No. 26-05-10 – Application of CL&P dba Eversource Energy to Amend its Rate Schedule

Dear Commissioners:

The Office of Consumer Counsel ("OCC") and the Office of Education, Outreach, and Enforcement ("EOE") respectfully submit to the Public Utilities Regulatory Authority ("Authority") this comment regarding the completeness of the Application filed by Eversource Energy ("Eversource") on July 14, 2026, requesting a rate increase.

The Authority has not currently indicated whether or not the Application is complete. Without a ruling from the Authority that the Application is incomplete, OCC and EOE had to begin discovery to protect the limited review time afforded by the statutory deadline. Further, OCC and EOE jointly filed a proposed schedule with Eversource, but as that proposal indicated, the proposed schedule should not be read as OCC and EOE taking a position on the completeness of the Application.[1]

To the contrary, after initial review, OCC and EOE have multiple reasons to believe the Application may be incomplete. First, the Application still lacks the public filing of many components, as noted in Motion No. 9 and its Ruling. Second, and more importantly, the Application contains storm costs and their supporting documentation through only March 2025. It is unclear if the Application is seeking to recover the full storm costs for 2025, but Exhibit CLP-REVREQ-2, WP C-3.26, cell E32, refers to "Actual Costs" in 2025 and bases the requested storm reserve funding on those costs averaged with storm costs from other years. If Eversource intends to request recovery of the full 2025 storm costs or uses the full 2025 storm costs to set ongoing rates, those costs must be included in the Application.[2] As seen in Docket No. 25-12-13 and from the 2024 storms presented herein, the evidence supporting storm costs is substantial. If the Authority determines the Application is now complete but Eversource waits until later in this proceeding to file the remaining 2025 invoices, OCC and EOE will be prejudiced by the lack of time to conduct a meaningful review.

The statutory timeframe for a rate case already offers woefully little time to review the

[1] OCC and EOE proposed a schedule for the Authority to consider *if* it considered the Application complete. From OCC's and EOE's perspective, the proposed schedule did not presume the Application was complete, but rather, protected their interests in scheduling if the Authority was issuing a schedule at this time.
[2] Interrogatory OCC-143 asked if Eversource intends to recover more 2025 storm costs in this proceeding. Its response is due on August 13, 2026.

Application of a utility whose rates have remained unreviewed for almost a decade. Allowing Eversource to string out its filing over months and further limit the time of that review harms ratepayers and curtails OCC's and EOE's ability to thoroughly review the filing. The term "complete" must have some meaning.

OCC and EOE thank the Authority for its consideration as it proceeds with the scheduling conference.

Respectfully submitted,
STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

Kimberly White
Attorney
10 Franklin Square
New Britain, CT 06051
860.827.2695

OFFICE OF EDUCATION, OUTREACH, &
ENFORCEMENT

By: /s/ Brittany Wyman

Brittany Wyman
Attorney
10 Franklin Square
New Britain, CT 06051
860.827.2667

CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 5th day of August, 2026.

/s/Kimberly White
Commissioner of the Superior Court