Date Filed: September 21, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, Steven C. Osuch and Warren R. Boutin
Request from: ALLCO

Question:

For the Card Street 11F substation and each circuit it serves (including Circuit 11F14), identify every interconnection application received since January 1, 2015, showing application number, application date, MW, current status, and (for interconnected projects) the date of interconnection approval and energization; and produce all hosting capacity analyses performed for that substation and its circuits since 2015.

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.

Without waiving said objection, the Company maintains and publishes an active interconnection queue for generators greater than 25 kW. The published queue identifies, among other information, the applicable substation, circuit, queue date, and project capacity. The Company also publishes hosting capacity maps that provide location-specific information, including hosting capacity values and DER currently online or in the queue. The information requested regarding individual projects and the applicable substations and circuits is available through the Company's publicly available interconnection resources.[1]

[1] https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect.