STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**SEPTEMBER 11, 2026**

THE OFFICE OF CONSUMER COUNSEL'S SEVENTEENTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **September 25, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-711 through OCC-741 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-711. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 120. All crew members and vehicles billed for 11 hours, but the times entered in boxes 24 and 25 indicate crews worked on different events, some of which do not tally to 11 hours of work. Please clarify if all crew members and vehicles worked 11 hours and, if so, explain how Eversource verified the amount of time each crew and vehicle worked.

OCC-712. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 122. The work descriptions include "comm down" and "comm box door open, close it and secured." Please explain what "comm" is in these descriptions.

OCC-713. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 129-144, 157-158. Many of the hotel receipts indicate one adult/guest in the room. Please provide the Company's policy and/or contractual provision with these vendors indicating the provision of individual hotel rooms.

OCC-714. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 153.
a. Box 12 indicates 11 hours of work, but boxes 24 and 25 appear to total a maximum of 9 hours of work (earliest work begins at 12:30 p.m.; latest work ends at 9:30 p.m.). Please explain why 11 hours of work was charged.
b. The crossover in work times in boxes 24 and 25 indicates not all crews could have worked until 9:30 p.m. Please explain how the Company verified every crew member and every vehicle listed worked 11 hours (or 9 hours, depending upon the response to (a)).

OCC-715. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 154.
a. Box 12 indicates 11 hours of work, but boxes 24 and 25 appear to total a maximum of 7 hours of work (earliest work begins at 12:30 p.m.; latest work ends at 7:30 p.m.). Please explain why 11 hours of work was charged.
b. In boxes 24 and 25, there is a three-hour gap in time (from 2:30 p.m. until 5:30 p.m.). Please explain what the crew and vehicles did during that time and why it was billed as work time.

OCC-716. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 155. Box 12 indicates a total work time of 16 hours, but boxes 24 and 25 appear to total a maximum work time of 12 hours.
a. Was this crew on standby from 6 a.m. to 8 a.m.? If yes, please explain why this time was billed as work time and not standby time? If no, please explain what occurred in those two hours and how Eversource is now aware of what occurred.
b. Please explain why the crew ended work at 8 p.m. but billed until 10 p.m.

OCC-717. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 156. Box 12 indicates a total work time of 16 hours, but boxes 24 and 25 appear to total a maximum work time of 7 hours.
a. Was this crew on standby from 6 a.m. to 8 a.m.? If yes, please explain why this time was billed as work time and not standby time? If no, please explain what occurred in those two hours and how Eversource is now aware of what occurred.
b. Please explain why the crew ended work at 6 p.m. but billed until 10 p.m.
c. In boxes 25 and 25, there is a three-hour gap in work time (from 2 pm until 5 p.m). Please explain what the crew and vehicles did during that time and why it was billed as work time.

OCC-718. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02)(MS24E), p. 173-198. Much of the work on these invoices was performed more than a week after MS24E and later. Please explain how the Company verified all of the work was attributable to MS24E and not to another event.

OCC-719. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 8. Box 12 indicates 10 hours of work but boxes 24 and 25 tally to 9 hours of work (from 6:30 to 15:30). Please explain the discrepancy.

OCC-720. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 9. Box 12 indicates 7 hours of work by boxes 24 and 25 tall only 5 hours 27 minutes work maximum (all entries start at 1500 to and the latest ends at 2027). Please explain the discrepancy.

OCC-721. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p.10. The last two entries in box 23 state, “”on hold until released” and “travel to show up clean park trucks.”
a. At what location was the crew “on hold”?
b. To where did the crew travel in the last entry?

OCC-722. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p.26-27. The storm codes have been written over, but appear to have originally indicated the work was associated with MN24F. Please explain how the Company verified that the work should have been associated with MS24E and provide all supporting substantiation.

OCC-723. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p.32-37. 41-43, 50-55. These invoices indicated the work was for MN24E. Please explain how the Company verified that the work should have been associated with MS24E rather than MN24F and provide all supporting substantiation.

OCC-724. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p.38-40. The storm codes have been written over, but originally indicated the work was attributable to MN24E. Further, the correction on page 39 attributes the work to MS24D01. Please explain how the Company verified that the work should have been associated with MS24E and provide all supporting substantiation.

OCC-725. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 44-46. Page 44 attributes the work to MN24F and page 45 attributes the work to MN24E. Please

explain how the Company verified that the work should have been associated with MS24E and provide all supporting substantiation.

OCC-726. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 47-49. Page 47 attributes the work to MN24F and it is unclear if page 48 attributes the work to MN24F or MN24E. Please explain how the Company verified that the work should have been associated with MS24E and provide all supporting substantiation.

OCC-727. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 69-71. The invoices indicate only "SAWC" and "Darien Yard." Please clarify if this crew was on standby throughout 3/11 and 3/12.

OCC-728. **(ACOSS)** Refer to Exh. CLP-ACOS-1, regarding the Minimum System Study.

a. In a live, unlocked Excel format with all links and formulas intact, please provide the Company's Minimum System Study and all underlying workpapers and data.
b. What is the kW or kVA capacity of the minimum size equipment the Company used for each FERC account?

OCC-729. **(ACOSS)** Refer to Exh. CLP-ACOS-1, Exh. CLP-ACOS-2, and Exh. CLP-RATES-1. In a live, unlocked Excel format with all links and formulas intact, please provide an alternate version of the ACOSS and of Table 1 under Exh. CLP-RATES-1, for each of the following scenarios:

a. In which FERC Accounts 364-368 are classified as 100% demand-related;
b. In which the primary distribution portion of FERC Accounts 364-368 are classified as 100% demand-related.

OCC-730. **(ACOSS)** Refer to Exh. CLP-ACOS-2. Using the most granular data available, please provide the following statistics for individual customer maximum demand for each customer class:

a. Minimum annual customer demand for the class
b. 25th percentile annual customer demand for the class
c. 50th percentile annual customer demand for the class
d. 75th percentile annual customer demand for the class
e. Maximum annual customer demand for the class

OCC-731. **(ACOSS)** Refer to Exh. CLP-ACOS-1. Please confirm that residential customers do not receive service at primary voltages.

OCC-732. **(ACOSS)** Refer to Exh. CLP-ACOS-1. Does the Company have the data needed to calculate customer-related unit costs separately for multi-family and single-family

customers? If so, please provide the data and calculation in a live, unlocked Excel format with all formulas intact, including a breakdown of the costs by FERC account. If not, please specify what additional data would be necessary to perform the calculation.

OCC-733. **(MCOSS)** Refer to Exh. CLP-MCOS-1, at 17-18. In a live, unlocked Excel format with all links and formulas intact, please provide the Company's probability of peak analysis and all underlying workpapers and data.

OCC-734. **(Residential Customer Charge)** Refer to Exh. CLP-RATES-2.13 and Exhibit CLP-RATES-1, at 17, which states "The Company completed the MRCC calculation, as provided in Exhibit CLP-RATES-2 2.13. This calculation produced a customer charge of $12.36 for Rate 1." Please explain why the value of $12.36 differs from the value of $11.09, as shown in row 65 of tab "Exh 2.13, 1 of 19."

OCC-735. **(Residential Customer Charge)** Refer to Exh. CLP-RATES-2.13, tab "Exh 2.13, 12 of 19" row 44. Refer also to Exh. CLP-RATES-2.13, tab "Exh 2.13, 1 of 19" row 65. Please explain why the total values on these rows differ.

OCC-736. **(Residential Customer Charge)** Refer to PURA's December 20, 2017 Decision in Docket No. 17-01-12, page 35, which states that the "Authority will operate on the rebuttable presumption that costs in Accounts 920, 921, and 923 are excluded from the MRCC calculation," and defines specific requirements that EDCs must satisfy in order to include these costs in the MRCC calculation. Please provide the justification for inclusion of these costs, including supporting documentation and workpapers.

OCC-737. **(Residential Customer Charge)** Refer to PURA's December 20, 2017 Decision in Docket No. 17-01-12, pages 35-36, which states that "The Authority finds that costs in Accounts 922, 928, 930, and 931 are outside of the statutory functions and are excluded from the MRCC calculation." Please explain why the Company has included costs in Account 930 in the calculation of the MRCC.

OCC-738. **(ACOSS)** Refer to Exh. CLP-ACOS-1 regarding the minimum distribution study. Refer also to PURA's October 28, 2025 Decision in Docket No. 24-10-04, pages 198-199, which states in part that "the minimum system's load-carrying capacity should be considered when allocating residual demand-related costs."

a. Please explain whether the Company considered the minimum system's load carrying capacity when allocating demand-related costs. If yes, please provide the workpapers, including assumptions, used for this calculation.

b. Please provide the rate year load-carrying capacity adjustments in a similar format to Table 81 on page 199 of the Decision in Docket No. 24-10-04.

OCC-739. **(ACOSS)** Is the Company proposing any recovery of AMI costs in this case? If yes, please provide the amount and the types of costs (by FERC account.)

OCC-740. **(ACOSS)** How does the Company propose to classify and allocate AMI costs?

OCC-741. **(AMI)** Refer to Exhibit CLP-AMI-2 regarding both quantitative and qualitative benefits. Please provide a rough estimate of how the benefits resulting from AMI meters might be classified (in terms of providing benefits that are customer-related, demand-related, or energy-related). For example, would the Company expect that approximately 50% of the benefits could be considered customer-related, 25% as energy-related, and 25% as demand-related? Please explain.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

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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 11th day of September, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court