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 1, 2026**

THE OFFICE OF CONSUMER COUNSEL'S TWELFTH 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 15, 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-519 through OCC-543 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

Leadership Panel Exhibit CLP-ELP-1 – Storm Cost Recovery

OCC-519. If adopted, the SCRAF review process will be used to recover prudently incurred, incremental catastrophic storm and pre-staging costs in excess of base rates for each calendar year (i.e., "reserve fund"). If storm costs do not exceed the amounts incorporated into base rates, the Company will not file any cost recovery via the SCRAF for that calendar year. The amount trued-up annually through the SCRAF process, will be amortized over a period of 1-5 years, subject to PURA decision based on the circumstances at the time of the SCRAF. Costs recovered through SCRAF would be subject to carrying charges equal to the Prime rate from the date of cost incurrence, applied to the net balance of the storm fund and pre-staging reserve fund for storms occurring after March, 2025.

a. Is this characterization of the Company's proposal accurate? If not, please explain any mischaracterizations of the Company's proposal.
b. Clarify the distinction, if any, between the "reserve funds" for catastrophic storms and pre-staging events and the amounts incorporated into base rates for catastrophic storms and pre-staging events.

OCC-520. The Company states that it would be inappropriate to consider the amount of catastrophic storm and pre-staging costs that is authorized for inclusion in base rates as a cap. If it were treated as a cap, it, "would only 'lessen any financial disincentive' to pre-stage for events up until the point annually that it had incurred pre-staging costs up to the level allowed in rates." (p.136).

a. Describe all financial disincentives the utility has to pre-stage for events beyond the level allowed in rates.
b. Describe all incentives the utility has to be cost-efficient in its pre-staging efforts and catastrophic storm response?
c. For the last 10 rate years, in which years did the Company incur pre-staging costs in excess of the level allowed in rates? For each applicable rate year, provide:
    i. the amount included in base rates,
    ii. the excess costs the Company requested for recovery,
    iii. The amount the PURA authorized as prudent for recovery.
d. For the last 10 rate years, in which years did the Company incur catastrophic storm costs in excess of the level allowed in rates? For each applicable rate year, provide:
    i. The amount included in base rates,
    ii. The excess costs the Company requested for recovery,
    iii. The amount the PURA authorized as prudent for recovery.

OCC-521. At page 134, testimony states, "The Company's current base distribution rates include $3 million annually for pre-staging events and $3 million annually for catastrophic storms." At page 135, testimony states, "the Company is proposing to include $60 million in base rates as a level of annual funding to the catastrophic storm reserve fund and $4 million as a level of annual funding for pre-staging events." If the PURA were to approve the Company's proposal to implement an annual SCRAF, explain the rationale for also increasing the base distribution rates from $3 million to $60 million for catastrophic storms and from $3 million to $4 million for pre-staging event reserve funding.

OCC-522. (Carrying charges applied to SCRAF) In its proposal, the Company notes, "should PURA implement the SCRAF, which provides for more timely review and recovery of storm and pre-staging costs, the Company accepts the Prime rate from the date of cost incurrence, applied to the net balance of the storm fund and pre-staging reserve fund 6 for storms occurring after March, 2025." (p.143) Did the company consider or analyze setting carrying charges on costs recovered through SCRAF to

be equal to the commercial paper index or the utility's actual cost of short-term debt, rather than the prime rate?

a. If yes, provide the analysis conducted and the rationale for proposing the use of the prime rate instead.
b. If not, explain why the Company did not consider proposing that the carrying charges on SCRAF recovery to be set at either the commercial paper index or actual cost of short-term debt.

Leadership Panel Exhibit CLP-ELP-3 – Performance Incentive Mechanisms and Metrics

OCC-523. Exhibit CLP-ELP-3 summarizes the Company's proposed PBR performance portfolio. Please explain how the Company determined that the proposed set of PIMs represents the appropriate performance areas to which financial incentives and/or penalties should be attached during the PBMRP term. In your response, please identify the criteria the Company used to determine which performance measures warranted financial incentives or penalties and explain how those criteria were applied to the potential PIMs identified in the Performance Evaluation System adopted in the Proposed Final Decision in Docket No. 21-05-15RE02.

Targeted System Performance Plan Exhibit CLP-TSP-1: Reliability PIMs

OCC-524. The Company proposes a sliding penalty structure for each Blue-Sky SAIDI and Blue-Sky SAIFI PIM, with penalties beginning at one standard deviation above the five-year average and increasing through two standard deviations.

a. Please explain how the Company developed this penalty structure and provide any analysis demonstrating how the proposed financial consequences are expected to maintain or improve reliability performance, consistent with the company's stated goals.
b. Were any other five year periods considered for the five-year average threshold? If yes, explain why the period 2022-2026 was selected for the calculation of the five-year average.

OCC-525. The final RE02 Performance Evaluation System identifies a potential Customer Reliability PIM based on CEMI-5, the percentage of repeat CEMI-5 customers, CELID-6, and the percentage of repeat CELID-6 customers. The Company instead proposes to use the average count of repeat CEMI-5 and repeat CELID-6 customers. Please explain why the Company selected this methodology and how it is expected to better incentivize improved reliability for customers experiencing frequent or long-duration outages.

OCC-526. Please provide any analysis comparing the Company's proposed Customer Reliability PIM methodology with the methodology identified in RE02. In particular, please identify whether the Company could earn an incentive under its proposed methodology in a year in which:

a. the total number or percentage of customers experiencing CEMI-5 increases;
b. the total number or percentage of customers experiencing CELID-6 increases; or
c. either measure worsens for particular customer groups or geographic areas.

Exhibit CLP-CUSTOMER-1: Customer PIM Suite

OCC-527. (Level 1 DER Interconnection Processing) The RE02 Performance Evaluation System identifies Level 1 DER Interconnection as a standalone potential PIM. The Company instead proposes to include Level 1 DER Interconnection Processing as one of five components of its Customer PIM Suite. Please explain why the Company selected a composite structure rather than the standalone PIM identified in RE02, including how incorporating Level 1 DER Interconnection performance into the Customer PIM Suite is expected to improve interconnection performance.

OCC-528. (Digital Customer Engagement) RE02 treats customer data engagement as a Metric rather than a PIM. The Company states that digital transactions have increased from approximately 88% to more than 92% over the past five years and that its proposed 92.18% target reflects performance that is already "nearing the performance ceiling." Please explain why performance above the proposed target warrants contributing to a positive financial incentive, including the incremental customer benefit expected from further increases in digital engagement and why such performance would not occur absent the incentive.

OCC-529. (Controllable Average Call Handle Time) RE02 includes Average Handle Time among the Existing Customer Service Metrics and does not identify it as a potential PIM. Please explain why reducing hold and post-call work time warrants contributing to a positive financial incentive, including why performance above the proposed target represents performance beyond ordinary operational efficiency and identifying any incremental customer benefits expected to result.

OCC-530. (Post Transaction Survey – CSR Attributes) The Company's proposed Post Transaction Survey component measures customer ratings of CSR courtesy, friendliness, knowledge, and concern for customer needs following telephone interactions. The RE02 Customer Satisfaction Scorecard measures customer satisfaction across customer service support, DER interconnection, and service interruptions, including satisfaction with issue resolution and overall interaction quality. Please explain why the Company proposes to attach a positive financial incentive to its Post Transaction Survey measure rather than the customer satisfaction measures developed in RE02. In your response, please explain why performance above the proposed 8.43 target represents exemplary performance warranting a shareholder incentive and identify any analysis demonstrating that improvement in the proposed CSR attributes is associated with improved customer outcomes.

OCC-531. (Average Discount Rate Enrollment Time) Please explain why a financial incentive for faster manual LIDR enrollment is necessary to advance customer affordability given the substantial enrollment already achieved through DSS data sharing and automatic enrollment. Please identify any analysis showing that faster manual processing would materially increase LIDR participation beyond levels achieved through those enrollment pathways.

OCC-532. (Customer PIM Suite Composite Index) The Company proposes to determine incentives and penalties based on the average of the five component index. Please identify whether performance above target on one or more Customer PIM Suite components could offset performance below target on another component, including Level 1 DER Interconnection Processing or Average Discount Rate Enrollment Time, such that the Company would avoid a penalty or earn an incentive. If so, please provide illustrative examples and explain why the Company considers such outcomes appropriate given the objectives of the affected components.

OCC-533. (Customer Receivables Greater than 60 Days) RE02's Accounts Receivable and Uncollectibles Scorecard includes five sub-metrics addressing residential arrears, accounts receivable, write-offs, and uncollectibles. The Company instead proposes to report only receivables greater than 60 days and to exclude hardship accounts. Please explain the basis for this narrower approach, including why the Company excludes hardship accounts and the other RE02 sub-metrics.

Performance Based Ratemaking Panel Exhibit CLP-PBR-1

OCC-534. Please explain the statement in Exhibit CLP-PBR-1 that the average OM&A PFP growth rate for 2015–2024 is -0.03% (page 64), with the results reported in Figure 5, LEI's Industry TFP results (2005-2024), which report an average OM&A PFP growth rate of -0.03% for 2005–2024, 0.30% for 2010–2024, and -0.35% for 2015–2024. In your response:

a. Identify the study period and OM&A PFP result actually relied upon to establish the proposed -0.03% X Factor;
b. Explain the basis for selecting that study period over the alternative periods presented in Exhibit CLP-PBR-1;
c. State whether the reference to 2015–2024 in Exhibit CLP-PBR-1 is an error and, if so, provide the corrected testimony; and
d. Explain whether selection of a different study period would change the Company's proposed X Factor and, if not, why not.
e. Please provide all calculations, workpapers, and supporting data used to derive the –0.03% X Factor in an Excel format.

OCC-535. Please explain why LEI determined that an aggregate chained Fisher Ideal index is the appropriate methodology for estimating the industry OM&A PFP used to

establish the Company's X Factor, rather than calculating utility-level OM&A productivity growth and then aggregating those utility-level results. In your response:

a. State whether LEI calculated annual OM&A PFP growth for each of the 88 individual EDCs included in the study and, if so, provide those results;
b. Provide the resulting industry OM&A PFP growth rates for the 2005–2024, 2010–2024, and 2015–2024 periods using
    i. an even-weighted average of utility-level OM&A PFP growth and
    ii. a cost-weighted average of utility-level OM&A PFP growth;
c. Compare results with the aggregate chained Fisher results reported in Exhibit CLP-PBR-2; and
d. Explain why LEI believes the aggregate chained Fisher result is more appropriate for setting the Company's X Factor than either of the alternative utility-level aggregation methods.
e. Please provide all underlying data and calculations in an unlocked Excel workbook with formulas intact.

OCC-536. Please explain in detail how differences in utility size affect each EDC's influence on the aggregate chained Fisher OM&A input index and OM&A PFP result reported in Exhibit CLP-PBR-2. In your response:

a. Describe how each EDC's OM&A input price, OM&A input quantity, and relative expenditure or value share enter the Laspeyres, Paasche, and Fisher Ideal index calculations;
b. Explain whether, and to what extent, larger EDCs have greater influence on the resulting industry OM&A PFP than smaller EDCs and EDCs that having similar size to the Company have greater influence on the resulting industry OM&A PFP than other EDCs
c. Provide, for each EDC and year, the data necessary to identify its relative contribution to the aggregate OM&A input index and customer output index; and
d. Explain how LEI evaluated whether the resulting weighting is representative of the productivity trend relevant to the Company.

OCC-537. Please explain why LEI determined that GDP-FSDP is an appropriate price measure for the entirety of the non-labor component of OM&A expense. In your response:

a. Identify the principal categories of expense included in the non-labor OM&A component and quantify the share attributable to outside services, contractors, and other labor-intensive purchased services, to the extent available;
b. Explain how LEI's methodology accounts for the labor component embedded in outsourced or contracted services that are classified as non-labor OM&A expense;

c. State whether LEI evaluated alternative materials-and-services or non-labor price indices, including any measure designed to reflect the labor intensity of purchased services, and provide the results of any such analysis; and
d. Provide a sensitivity analysis showing the effect on industry OM&A input growth, OM&A PFP, and the proposed X Factor of using any alternative non-labor input-price measure considered by LEI.

OCC-538. Please provide a sensitivity analysis showing the effect of unusually volatile pandemic-period observations on LEI's reported 2005–2024 average OM&A PFP growth rate of -0.03%. At a minimum, please provide:
a. The average OM&A PFP growth rate excluding the 2019–2020 observation;
b. The average OM&A PFP growth rate excluding both the 2019–2020 and 2020–2021 observations;
c. The median annual OM&A PFP growth rate over the 2005–2024 study period; and
d. An explanation of whether LEI performed any outlier, structural-break, or other sensitivity analysis to determine whether the long-run OM&A PFP result is representative of expected productivity during the Company's proposed PBMRP term.

OCC-539. Please explain the relationship, under the Company's proposed framework, between a utility's relative cost efficiency and the appropriate level of the Consumer Dividend.
a. Specifically, all else equal, would a utility whose OM&A costs are materially above its peer benchmark warrant a higher, lower, or unchanged Consumer Dividend relative to a utility whose OM&A costs are below its benchmark?
b. Please explain the economic rationale for the Company's answer and how that rationale was applied to the Company's proposal.

OCC-540. Please identify which of the 88 EDCs included in LEI's Industry TFP and PFP Study operated under a performance-based regulation (PBR) framework, as opposed to traditional cost-of-service regulation, during the 2005–2024 study period, including the applicable years for each regulatory framework.

OCC-541. Please state whether LEI evaluated whether OM&A PFP trends differed between utilities operating under the PBR and utilities operating under traditional cost-of-service regulation, and whether utilities' OM&A PFP trends differed between periods before PBR application and under PBR application. If so, please provide the results of the analysis. If not, please explain why such an analysis was not performed and provide, if available, the OM&A PFP growth rates separately for the two different groups.

OCC-542. Please state whether excluding utilities operating under PBR, or alternatively calculating OM&A PFP separately for PBR and non-PBR utilities, would change the -0.3% OM&A PFP estimated used for supporting the proposed X factor.

OCC-543. Given that the proposed Consumer Dividend applies to the OM&A portion of the PBMRP, please explain why the Company's below-benchmark capital and total cost performance is relevant to determining the appropriate Consumer Dividend. In your response:

a. Explain the relative weight or consideration given to OM&A, capital, and total cost benchmarking results in supporting the proposed 0.30% Consumer Dividend
b. Explain why favorable capital performance should moderate the Consumer Dividend when capital costs are recovered outside the I-X OM&A revenue adjustment mechanism.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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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 1st day of September, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court