STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: APPLICATION OF THE	**:**	
CONNECTICUT LIGHT AND POWER	**:**	**DOCKET NO. 26-05-10**
COMPANY D/B/A EVERSOURCE	**:**	
ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**AUGUST 13, 2026**

CONSERVATION LAW FOUNDATION'S FIRST SET OF INTERROGATORIES

Conservation Law Foundation ("CLF") requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company") to the following interrogatories in the above-captioned proceeding by August 27, 2026. If there are objections to any questions, or if providing responses to any questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

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 document.

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.

F. Where an Interrogatory asks to provide all documents please provide all data, assumptions, schedules, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of live unlocked Microsoft Excel spreadsheet files with all cell references/links and formulae intact.

G. Each Interrogatory to provide all documents or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

H. If the Company finds any request to be ambiguous, please notify Conservation Law Foundation through their counsel so the request can be clarified prior to the preparation of a written response.

I. If information requested is not available and cannot be made available in the exact form requested, provide such information or documents as can be made available that best respond to the request.

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 requests 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 is adopted by the Authority in this Docket.

INTERROGATORIES

Interrogatories CLF-1 through CLF-11 are directed to the Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company").

CLF-1. **(SPACE HEATING RATE)** Please refer to Exhibit CLP-RATES-1 at 34, lines 5-7: "For an average customer without a heat pump, average usage across the year is approximately 700 kWh per month, with some degree of seasonal variability." For customers without a heat pump, what is the average monthly usage of the median customer for each month of the year?

CLF-2. **(SPACE HEATING RATE)** Please refer to Exhibit CLP-RATES-1 at 32, lines 7-8: "Rate 6 will be available to any residential customer that currently heats with a delivered fuel heating system and demonstrates that it has installed air-source heat pump(s) or any new home build after July 1, 2027 that can demonstrate that they have installed air- source heat pump(s) for home space heating."

a. Please provide the definition of a "delivered fuel heating system" the Company would use to determine customer eligibility for Rate 6.
b. Is a heating system using natural gas considered a "delivered fuel heating system"? If not, why not?
c. Please provide copies of all notes, memorandum, reports, e-mails and text messages which discuss, reference, or conclude: 1) whether to include or exclude natural gas heating systems within the definition of a "delivered fuel heating system"; and/or 2) whether to provide eligibility for the new Rate 6 rate to Rate 1 customers who replace a natural gas heating system with an electric heat pump.
d. Why are new or existing geothermal heat pump customers not eligible for the proposed rate?
e. If a customer becomes eligible for and takes service under Rate 6, and subsequently either sells the dwelling or rents it, will the new owner or tenant remain eligible for Rate 6? If not, why not?
f. If a customer in a single dwelling unit becomes eligible for and takes service under rate 6 and subsequently converts the property to multiple dwelling units, will the customers in the new multiple dwelling units remain eligible for Rate 6? If not, why not?

CLF-3. **(SPACE HEATING RATE)** Proposed Rate 6 is described as "designed to provide a discounted rate for the incremental usage of residential electric service customers who adopt new electric air source heat pump technologies for space heating purposes." Exhibit CLP-RATES-1 at 31, lines 16-18.

a. What is the purpose of the discount? What goal does the Company seek to accomplish with the discount?
b. How did the Company determine that the proposed level of the discount is sufficient to satisfy that goal?

CLF-4. **(SPACE HEATING RATE)** Why is the Company proposing that Rate 6 will only be available for R1 customers who install a new heat pump system after January 1, 2026? What rate design or revenue design goal is satisfied by limiting Rate 6 eligibility to such customers?

CLF-5. **(SPACE HEATING RATE)** Did the Company conduct any customer surveys or hold any focus groups as part of its process in designing Rate 6? If yes, please provide all reports, memorandums, or papers resulting from such surveys or focus groups.

CLF-6. **(SPACE HEATING RATE)** Did the Company meet with and/or discuss the development of Rate 6 with any heat pump related trade groups, manufacturers, or distributors?

CLF-7. **(SPACE HEATING RATE)** Please describe the Company's plan to notify customers about the availability of Rate 6. Provide copies of all advertising, marketing and educational materials, including bill inserts, transcripts of any media spots, and scripts for customer service representatives. If such materials have not been prepared, when does the Company intend to provide them for review and comment by interested parties?

CLF-8. **(SPACE HEATING RATE)** Why did the Company choose to not copy the residential heat pump rate offering of its Massachusetts affiliate and provide for the automatic enrollment of all known existing heat pump customers into Rate 6?

CLF-9. **(SPACE HEATING RATE)** Do you agree that, given the proposed increase in the customer charge and the expected increase in annual electric usage for a customer taking service under Rate 6, such customers will significantly increase their contribution to the residential class's proportional allocation of the Company's fixed delivery costs compared to customers who remain on Rate 1?

CLF-10. **(SPACE HEATING RATE)** Why did the Company choose to define the heating season as November through March for Rate 6?

CLF-11. **(SPACE HEATING RATE)** See Exhibit CLP-IAP-1. Please provide copies of any papers, presentations, testimonies (whether pre-filed or delivered live) or opinion pieces prepared by Apex Analytics or, separately, by either Mr. Nelson or Mr. Goldman, within the last five years, on the subject of residential space heating rates and/or rate design, and/or residential heat pumps (including but not limited to heat pump cost, rate design, installation incentives, and tie-in with home energy audit and insulation programs.) If presented as live testimony, please

include copies of transcripts of the direct, cross-examination, and redirect examination of the witness or witness panel.

Respectfully submitted,

Shannon Laun
Senior Attorney
Conservation Law Foundation
195 Church Street
Mezzanine Level, Suite B
New Haven, CT 06510
P: 475-261-9538
E: slaun@clf.org

CERTIFICATE OF SERVICE

This is to certify that on August 13, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served via electronic mail upon all parties designated on the Authority's official service list in the applicable proceeding in accordance with R.C.S.A. § 16-1-15.

/s/ Shannon Laun

Shannon Laun
Conservation Law Foundation