STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

July 31, 2026
Docket No. 26-05-10

All Service List Participants for
Connecticut Light and Power Company
d/b/a Eversource Energy

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

Enclosed are interrogatories **EOE-1 through EOE-118** directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company"). The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) Office of Education, Outreach, and Enforcement (EOE) in connection with the above referenced docket, and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **4pm on August 14, 2026**. If a response to any of the requested information has already been filed in response to another interrogatory response in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

EOE requests that all interrogatory responses be included in the same document, rather than responses to each interrogatory being filed as individual documents.

Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to Electronic Filing on the Authority's website for more information. **Paper filings will be accepted only if a person is unable to file electronically. The Authority reserves the right to request paper copies of certain filings at a later date.** No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by email using the following directions: confidential material must be emailed directly to **Jeff.Gaudiosi@ct.gov** in an email with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed publicly.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion, a proposed protective order and nondisclosure agreement must be appended to the Motion. The Authority will rule on the Motion forthwith, and give further direction as necessary. Contact the Authority's Executive Secretary at (860) 827-1553 with questions regarding making a confidential filing.

The current service list for this docket is available on the Authority's website located at www.dpuc.state.ct.us/DPUCservlist.html.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I 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.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

The following Interrogatories, designated as EOE-1 through EOE-118, are directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company").

EOE-1. (CUSTOMER CALLS) Please provide the first two recordings regarding termination of service (due to nonpayment), hardship, difficulty paying, or payment arrangement in each hour the Company's call center was open on: January 22, 2025; February 7, 2025; March 18, 2025; April 28, 2025; May 28, 2025; June 19, 2025; July 7, 2025; August 12, 2025; September 16, 2025; October 15, 2025; November 6, 2025; and December 29, 2025.

EOE-2. (INFORMATION TECHNOLOGY REVIEWS) Does the Company regularly perform security evaluations or have an independent evaluation of its technological infrastructure systems? Please provide all related Company policies and procedures regarding cybersecurity protections and cybersecurity evaluations of the Company's technology systems.

EOE-3. (INFORMATION TECHNOLOGY REVIEWS) Identify if the Company has engaged external consultants to perform independent security evaluations of the Company's various systems. If performed, provide a list of which systems were evaluated, the purpose of that system and copies of those evaluations. If not performed, explain why.

EOE-4. (CUSTOMER DATA) Explain if the Company has or plans to provide or sell customer information, including geolocation data, to third-party providers. If data is provided, identify each of the third-party providers, the information provided, the purpose of the information being provided, and identify if the Company receives any revenue associated with the sharing (i.e., selling) of information with the third-party provider.

EOE-5. (VENDOR CONTRACTS) Provide a list of third-party vendors utilized by the Company during the test year. For each vendor please include:

a. A brief description of the work performed; and
b. The fully executed contract with each third-party vendor including all amendments and supporting schedules. Additionally, provide any historical versions of the contract since the last rate case.

EOE-6. (CHARITABLE LABOR) Does the Company permit employees to support charitable activities during working hours?
a. If yes, has the Company eliminated employee labor costs from the revenue request to account for these hours? Include which exhibits demonstrate the Company's elimination of these costs.
b. If yes, but the Company has not eliminated the associated employee labor costs from its revenue requirements, provide an unlocked Excel

spreadsheet detailing the total hours and associated costs (i.e., fully loaded labor costs) for each year 2020 through 2025.

EOE-7. (STORM REPORTING) Respond to the following:

a. Explain the Company's storm reporting requirements to include any reporting outlined within Docket No. 86-11-18.

b. Provide an unlocked Excel spreadsheet detailing each catastrophic Storm event from the period 2018 through March 2025.

c. For the storms included in (b) identify if a 'Notice of Pre-Staging of Resources' or a 'post-event report' was filed with the Authority. Furthermore, provide a copy of each filing citing where and when it was filed. 'Notice of Pre-Staging of Resources' or a 'post-event report' for a certain storm was not filed, explain why.

EOE-8. (STORM COSTS) Respond to the following:

a. Identify each interrogatory response where the Company reduced its storm recovery request based on confirmed errors or unsupported amounts in Docket No. 25-12-13. Please include the Company's response to each interrogatory. Do not include any reduction which resulted from shifting costs between different storm events.

b. In an unlocked excel spreadsheet list every reduction included in (a), above, the category of the cost, the total reduction for each storm event, and financial impact of that reduction to the specific storm event cost.

EOE-9. (STORM) Refer to the Company's response to EOE-8, above. Please explain if the Company has implemented any corrective actions or internal controls to prevent/minimize those adjustments within the current docket's storm activity. Provide all supporting internal and external documentation.

EOE-10. (STORM EMERGENCY RESPONSE PLANS-ERP) List all changes made to the Company's Emergency Response Plan (ERP) document between the period 2018 and present. Please identify where each change was made (i.e., which year and which page in the applicable ERP). Additionally, provide copies of all versions of the ERP documents.

EOE-11. (STORM EVENT LEVEL MATRIX) Identify any changes made to the Company's Event Level Matrix (ELM) between the period 2022 and present. Additionally, please confirm that there have only been five versions of the ELM as included within Ex. CLP-STORM-IMT-2, pp. 26-30.

EOE-12. (STORM ERP ACTIVATION VS. IMPLEMENTATION) Does the Company distinguish between an ERP activation versus implementation? If yes, please explain how the Company determines which is applicable. Include all relevant citations to the Company's ERP. Further provide all Company policies and procedures outlining when each designation is applicable. Separately identify

whether each storm event provided in Ex. CLP-STORM-2 had “activated” or “implemented” the Company’s ERP.

EOE-13. (NON-CATASTROPHIC STORM EVENTS) Provide a listing of all storm events subject to a Storm Work Order for the years 2024 through present that did not exceed the $4 million catastrophic storm eligibility threshold. Additionally, provide a breakdown of the associated costs and the specific date range for each event (i.e., beginning and ending).

EOE-14. (STORM 3rd PARTY INVENTORY/CONTRACTS) Respond to the following:

- **a.** Provide a complete listing of all outside contractors and vendors used in support of storm remediation, including a brief explanation of the work performed by each contractor and vendor.
- **b.** Provide complete copies of all executed contracts for each vendor listed in (a) above, inclusive of pricing schedules.
- **c.** Cite the specific documents and applicable pages that support the pricing for each contractor/vendor for each storm event for which the Company is seeking recovery in this docket.

EOE-15. (STORM RESPONSE-INTERNAL AUDIT REVIEWS) Identify if the Company has performed an Internal Audit over its storm response or any related activities since 2023. If applicable, provide complete copies of any Internal Audit Reports inclusive of all findings, observations, and remediations. If internal audits have not occurred, please explain why not.

EOE-16. (STORM REVENEW UPDATE) Explain the specific services that have been performed by the Revenew vendor and provide an updated status of any billing reviews or negotiations since March 10, 2026, to the present.

EOE-17. (STORM INDEPENDENT REVIEW) Has the Company engaged any external vendors to evaluate the accuracy of the catastrophic storm recovery amounts included within the rate case application? If an independent review has occurred, explain the nature of the engagement and provide the fully executed contract including any modifications and attachments thereof, and provide all documentation and results associated with each vendors’ evaluation.

EOE-18. (STORM CUSTOMER CONTRIBUTIONS) Refer to Exhibit-ACCT-1, WACC Cust Cont, Column E. Explain how each of the customer contribution amounts were derived.

EOE-19. (STORM EVENT TIMING) Provide an unlocked Excel spreadsheet that details the following information for each storm event included within the Company’s application:

- **a.** Event
- **b.** Storm Start Date
- **c.** Storm End Date

d. Date/time of ERP declaration
e. Date/time of 95% restoration
f. Date/time of 99% restoration
g. Date/time of communicated demobilization
h. Date/time of actual demobilization
i. Date/time of initial external vendor (line crew) billing
j. Date/time of final external vendor (line crew) billing
k. Date/time of initial external vendor (vegetation crew) billing
l. Date/time of final external vendor (vegetation crew) billing

EOE-20. (STORM RESTORATION) Provide an unlocked Excel spreadsheet that details each storm event's outages to include both the outage onset (i.e., date/time) and restoration (i.e., date/time). Specifically, EOE requests an Excel file that details each storm's information similar to EOE-075, Att.2 within Docket No. 25-12-13.

EOE-21. (STORM STAFFING) Provide an unlocked Excel spreadsheet identifying each storm event included within the Company's application:
a. Event
b. Number of line crew resources available by resource type (Internal, Affiliated, Non- Affiliated Contractor, Mutual Aid) at onset
c. Number of line crew resources available by resource type (Internal, Affiliated, Non- Affiliated Contractor, Mutual Aid) at peak
d. Number of vegetation crew resources available by resource type (Internal, Affiliated, Non- Affiliated Contractor, Mutual Aid) at onset
e. Number of vegetation crew resources available by resource type (Internal, Affiliated, Non- Affiliated Contractor, Mutual Aid) at peak

EOE-22. (VENDOR TIMESHEET REQUIREMENTS) Outline the minimum documentation requirements for vendor timesheets (including line crews, vegetation crews, and other types of crews), or other similar documents.
a. Provide copies of all policies, procedures, guidance, or other literature, including, but not limited to the Eversource Contractor Storm Daily Time & Work Report Procedure, that discusses the Company's handling of timesheets.
b. Identify any differences in the documentation requirements between storm and non-storm activity. Please note where in the Company's policies, procedures, guidance, or other literature, those differences are indicated.

EOE-23. (STORM BILLING GUIDANCE) Respond to the following:
a. Provide copies of all policies, procedures, or other guidance, including guidance on billing hours worked (i.e., travel, standby, and work classifications) provided internally and externally with line crew, damage assessor, and vegetation crew vendors.
b. Provide the fully executed contracts with the Company's external line crew, damage assessor, or vegetation crew vendors, not already provided in

response to EOE-14. Further indicate where in each contract the Company outlined the correct billing of travel, standby, and work (i.e., particularly in situations where the billing categories are billed at different rates).

EOE-24. (MASTER SERVICE AGREEMENT) Provide a copy of the Company's Master Service Agreement (MSA) with each line crew contractor effective from 2018 to present. Further identify all changes made to the MSAs since 2018.

EOE-25. (STORM REST TIME) Identify if the storm recovery balance includes any costs for external vendor rest time. If any amounts are included, identify the amount, vendor, storm event, invoice cite, and other relevant details.

EOE-26. (FRONTIER) Provide all contracts, settlement agreements, or intercompany operating agreements with Frontier that details cost allocation requirements for the Company's vegetation management costs. Additionally, provide an unlocked Excel spreadsheet that details each of the storm event's vegetation management costs and the corresponding Frontier billing offset.

EOE-27. (VEGETATION) Provide a detailed listing of all food and lodging costs paid directly by the Company that were included in the storm recovery amounts and were applicable to vegetation crews. Please do not include any costs which were already included in an invoice provided by a vegetation management vendor. To the extent that the food and lodging costs were applicable to multiple types of crews (i.e., vegetation, line, damage assessors), provide both the total cost and an estimated allocation percentage applicable to vegetation. As part of the response, please cite the amounts within the respective Exhibit ACCT-2 documents.

EOE-28. (FRONTIER) Refer to Exhibit CLP-STORM-1, p. 82. The Company's PFT references a shift in the 2024-2025 costs as driven by "improvements in the Frontier Settlement billing process." Explain the specific improvements and provide supporting documentation and calculations, if applicable.

EOE-29. (CAPITALIZATION) Refer to Exhibit CLP-STORM-1, p. 82. The Company's PFT references a shift in the 2024-2025 costs as driven by "refinements to capitalization practices." Explain the specific improvements and provide supporting documentation and calculations, if applicable.

EOE-30. (STORM EVENT DOCUMENTATION) For each catastrophic storm event included in the Company's storm request, provide an unlocked Excel spreadsheet detailing the total number of billable hours for each external line crew. Specifically include the breakdown of hours split between work, standby, and mobilization/demobilization. Additionally, identify the total dollar amount billed for each category, summarize the total number of hours per category, and cite the supporting documentation.

EOE-31. (STORM FLEET) Provide details regarding the Company's use of the Storm Fleet including information on the annual costs (2024 through present), the number of available units (i.e., vehicles) per location (i.e., state), the number of hours used per storm event, the total cost allocated to each storm event, and any other relevant details that would assist in minimizing following interrogatories. To the extent that the Storm Fleet has been used by the Company's affiliates, provide details.

EOE-32. (STORM FLEET) Provide a copy of the Company's Benefit-Cost Analysis (BCA) used to support the creation of the storm fleet. Additionally, provide any post implementation analysis that supports the continued benefits for continuing to maintain the storm fleet based on actual cost savings. If a post-implementation analysis has not been performed, explain why.

EOE-33. (STORM – DRONE USAGE) Discuss the Company's use of drones in support of storm remediation efforts. As part of the response, identify when the Company first started using drones, explain the nature of these services as performed by either internal or external parties, and explain how these costs have impacted (i.e., reduced) other offsetting costs (i.e., patrols). Finally, provide a detailed listing of drone expenses by year (2018 through present), identify any drone-related capital additions (i.e., drone purchases), and identify where in the Company's application those costs are included.

EOE-34. (STORM-DETAILED EXPENSES) Refer to Exhibit ACCT-2 Excel spreadsheets. Provide consolidated Excel spreadsheet(s) detailing the costs included within the Exhibit ACCT-2 tabs for each storm event with an additional column that captures the applicable storm reference (i.e., Labor by Empl. Title, Materials, Outside Contractors-Vendors, etc.). EOE requests that all storm events for each category be included on the same tabs in a structured manner to allow for all recovery amounts to be more easily analyzed.

EOE-35. (STORM EMERGENCY RESPONSE PAY/STIPEND) Identify if the storm balances include any incremental overtime costs for exempt (salaried) employees. If included, provide an unlocked Excel spreadsheet detailing each applicable storm event, employee, number of hours worked per day (i.e., specific calendar date), number of OT hours worked per day, hourly rate, total incremental charge, and a description of the work performed. Separately, provide an unlocked Excel spreadsheet demonstrating how the hourly rate was calculated (as presented in first Excel spreadsheet).

EOE-36. (STORM EMERGENCY RESPONSE PAY/STIPEND) Provide copies of any applicable emergency response pay policies or procedures applicable to incremental amounts included within the Company's storm balance.

EOE-37. (STORM – WIRE DOWN GUARDS) Provide an unlocked Excel spreadsheet listing of all wire down guard crews that were engaged from out-of-state for any

of the catastrophic storms included in the application. As part of the information provided, please identify the following information:

a. Storm
b. Vendor
c. Mobilization Location
d. Number of resources
e. Total Cost
f. Actions taken to engage local crews
g. Citations for supporting documents (i.e., invoices, timesheets, etc.)

EOE-38. (MUTUAL AID) Provide a detailed description for how the Company tracks Mutual Aid provided to other Companies (including affiliates or other utilities). Additionally, identify the monthly amounts of Mutual Aid provided to other Companies that were reimbursed for the years 2024 through present. As part of the response, provide a breakdown of the amounts reimbursed, separately detailing costs that are included in base rates (i.e., base salary, vehicle wear/tear such as depreciation and maintenance costs, etc.) versus those that are incremental (i.e., overtime costs, fuel, meals, etc.).

EOE-39. (MUTUAL AID) Explain how the Company accounts for Mutual Aid revenue and specifically indicate if any of the Mutual Aid revenue received was used to offset against the storm regulatory asset for years 2024 through present. Provide details and cross-references to submission documentation, if appropriate.

EOE-40. (INTERNAL STAFFING-STORM) Provide a listing of each responsibility and activity performed by the Company which is required to support storm response efforts. Specifically include a description of the duties performed in support of each responsibility and activity and the responsible employee position(s).

EOE-41. (UNION AGREEMENTS) Provide both a listing of and copies of all union agreements in effect between 2018 and present.

EOE-42. (EVERSOURCE EMPLOYEE SUPPORT) Provide an unlocked Excel spreadsheet detailing all Company employees (CL&P) who charged time to work orders for affiliates for each year, 2018 through present. Please identify the affiliate, year, employee title, allocated charge amount, and allocated non-productive time (NPT) charge amount. Additionally, provide a breakdown of the allocated charges between the employee's straight time costs versus any incremental time costs (including OT, DT, Premium hours).

EOE-43. (DOCK CREW SUPPORT-STORM) Provide a detailed listing of each external vendor, by year (2024 through present), who provided daily line crew support for any storm event included in the Company's storm recovery balance. As part of the response, identify the total billed amounts for activity that occurred after the Company has demobilized from the storm events and specifically identify the amounts per storm event.

EOE-44. (STORM: RIGHT OF FIRST REFUSAL-RoFR) Respond to the following:

- **a.** Discuss the nature of a RoFR contract.
- **b.** Identify all external vendors subject to a RoFR agreement and separately provide a listing of all instances where a RoFR was initiated.
- **c.** Provide a complete copy of each vendor's RoFR contract and the corresponding pricing schedules.
- **d.** For each vendor/contract identified in subsection b & c above, identify if the RoFR rates are in excess of the Company's standard contract rates. If the RoFR rates are higher, provide an unlocked Excel spreadsheet that compares the rates.

EOE-45. (P-CARD) Refer to Exhibit CLP-STORM-1, pp. 97-99. Respond to the following:

- **a.** Explain if the Company's administration of P-Card transactions is consistent between storm and non-storm activity. If differences exist – please discuss.
- **b.** Identify how the P-Card custodian validates the relevance of the P-Card transactions for the various storm events. For example, does the P-Card custodian rely on representations of the P-Card user or do they perform any independent validation of the costs? Please discuss.
- **c.** Explain where receipts and other supporting documentation are attached (i.e., retained)?
- **d.** Provide a detailed listing of all data elements that are available to be exported from the JP Morgan P-Card transaction system referenced on p. 98. Additionally, identify if there are any system limitations that would prevent information from being extracted into an unlocked Excel file.

EOE-46. (PROCUREMENT PROCEDURES) Provide copies of the Company's procurement-related policies, procedures, and guidance including details regarding the Company's competitive bid requirements. Provide all versions from 2018 to present and identify any changes that have occurred. Furthermore, specify the materiality of annual (or total) projected spend that requires a competitive bid analysis, the minimum number of proposals, and the frequency of updates. Additionally, identify the requirements for permitting any single source vendors.

EOE-47. (PROCUREMENT PROCEDURES) In addition, to providing the requested policies, procedures, and guidance in EOE-46, above, please provide the following:

- **a.** Each instance from 2018 through the present in which the Company approved an exception to its competitive bidding requirements;
- **b.** The approving individual(s);
- **c.** The justification for the exception;
- **d.** The associated vendor and contract value; and
- **e.** Whether the exception was documented in writing and where that documentation is maintained.

EOE-48. (PROCUREMENT ORGANIZATIONAL CHART) Provide a copy of the procurement organization's organizational chart applicable for each year-end 2018-2025, including names and positions. Separately, provide a listing of all procurement employees employed during the period 2018 through present and identify their hire date, position/level, promotion date, and termination date, if applicable.

EOE-49. (PROCUREMENT SYSTEM FLOWS) Provide both a listing of procurement related applications and a systems flowchart detailing the interactions between the various applications. As part of the response, please discuss each system and identify which systems include systemic approval limits. Additionally, identify the process for updating approval limits within the respective systems.

EOE-50. (APPROVAL LEVELS) Provide an unlocked Excel spreadsheet detailing each individual's approval levels applicable to the procurement process for each year beginning in 2018 to the present.

EOE-51. (COMPETITIVE BID ASSESSMENTS) Provide an unlocked Excel spreadsheet detailing each external vendor utilized between 2018 and 2025, and separately identify the total spend by year broken down between O&M, Capital, Storm, and Other (if applicable). Additionally, identify the most recent contract effective date, identify if the vendor is subject to a competitive bid process or a sole source justification, and identify when the last competitive bid/sole source justification occurred. To assist with this request, EOE offers the following visual but is not opposed to separate spreadsheets for each year:

							A	B	C
Vendor Name	**Spend by Year**					**Most Recent Contract Effective Date**	**Competitive Bid or Sole Source**	**If Comp Bid, most recent completion date.**	**If Sole Source, most recent approval date.**
		O&M	**Capital**	**Storm**	**Total**				
Entity #1	2022	$$	$$	$$	$$				
	2023	$$	$$	$$	$$				
	2024	$$	$$	$$	$$				
	2025	$$	$$	$$	$$				
Entity #2	2022	$$	$$	$$	$$				
	2023	$$	$$	$$	$$				
	2024	$$	$$	$$	$$				
	2025	$$	$$	$$	$$				

EOE-52. (SINGLE SOURCE VENDORS) Provide an unlocked Excel spreadsheet detailing all external vendors that were onboarded between 2018 and present and were subject to a single source approval. As part of the request, identify the annual spend for each year 2018 through 2025.

EOE-53. (SINGLE SOURCE VENDORS) Provide an unlocked Excel spreadsheet detailing all external vendors that were utilized between 2018 and present and were subject to a single source approval. As part of the request, identify the annual spend for each year 2018 through 2025.

EOE-54. (PURCHASE ORDERS) Provide an unlocked Excel spreadsheet detailing all purchase orders issued from 2018 through present. As part of the information provided, identify the Purchase Order (PO) number, the initial authorized PO amount, the initial PO approver, the initial PO approval date, the vendor name, and provide similar details for any subsequent PO increases, if applicable. To the extent that a PO applies to multiple affiliates, please separately identify the total PO amount and the relevant amount(s) applicable to Connecticut.

EOE-55. (CONTRACTS) Explain how contracts are administered by the Company to include the requirements for when a contract is required and how the contracts are tracked. As part of the response, please also provide a detailed listing of available fields (i.e., data elements) for information that could be provided in the event that an inventory of contracts is requested.

EOE-56. (MILESTONE PAYMENTS) Explain the Company's process for permitting milestone payments prior to work being performed or costs being incurred by the Company's vendors.

EOE-57. (PROCUREMENT-INTERNAL AUDIT REVIEWS) Identify if the Company has performed an Internal Audit over its procurement organization, procurement applications, or any related activities since 2018. If applicable, provide complete copies of any Internal Audit Reports inclusive of all findings, observations, and remediations. If an internal audit has not occurred, please explain why not.

EOE-58. (EMPLOYEE MEALS) Provide any internal employee policies, procedures, or guidelines detailing the maximum cost(s) per meal that the Company would reimburse for employees. If minimum guidelines do not exist, please explain why and provide the maximum monetary threshold that the Company would determine to be 'reasonable and customary'.

EOE-59. (PILOT PROGRAMS) Identify if there are any non-recurring pilot programs that have been included in the Company's Test Year or Rate Year operations and maintenance (O&M) expense. If included, provide details and costs on the programs.

EOE-60. (ACCOUNTING POLICY MANUALS) Provide both a detailed listing of all Accounting Policy Manuals or Procedures, along with copies of the actual documents.

EOE-61. (RECEIVABLES/UNCOLLECTIBLES) Provide a complete copy of any and all internal Company policies and procedures regarding the administration of receivable balances, the treatment of uncollectible accounts, and reserving. This should include details regarding the establishment of bad debt reserves, the account write-off process (including the size of arrears in dollars and

months eligible for write-off), and should specifically identify details regarding both Hardship and Non-Hardship treatments.

EOE-62. (EARNINGS SHARING MECHANISM-ESM) Provide an unlocked Excel spreadsheet detailing the Company's annual ESM results (i.e., calculated return on equity-ROE) in comparison to the Company's authorized ROE each annual ESM filing since the Company's last rate case. Separately, provide a similar comparison of the Company's "hypothetical" annual ROE results to the Company's authorized ROE whereby the "hypothetical" ROE results are capped at the equity ratio authorized in the last rate case.

EOE-63. (EARNINGS SHARING MECHANISM-ESM) Provide copies of each annual ESM filing since the Company's last rate case.

EOE-64. (ANNUAL REVENUE REQUIREMENTS) Identify the Company's authorized annual revenue requirements for each calendar year 2018 through present.

EOE-65. (AFFILIATE ORGANIZATIONAL STRUCTURE) Provide both a visual representation (i.e., affiliate organizational chart) and a narrative discussion of all Company affiliates.

EOE-66. (COST ALLOCATIONS) Provide a complete copy of any and all internal Company policies and procedures regarding the Company's cost allocation approaches including allocation methodologies for all affiliates.

EOE-67. (PHOTOGRAPHY) Provide a detailed listing of all photography related costs included within the Company's Test Year O&M expenses and corresponding Rate Year expenses. Additionally, identify all Photography related expenses included within any other deferred cost, including storm costs.

EOE-68. (IDENTITY VERIFICATION STANDARDS) Describe in detail the Company's identity verification requirements for establishing a residential electric account, including but not limited to: (a) whether a Social Security number is required; (b) what alternative forms of identification are accepted; and (c) the documentation or validation standards applied to each form of identification.

EOE-69. (ACCOUNT ESTABLISHMENT PROCESS-TELEPHONE) Describe the procedures and requirements for establishing a customer account via telephone, including all information required from the customer and any verification steps performed by Company representatives.

EOE-70. (DATA RETENTION AND SYSTEM DESIGN) Explain the Company's policies and system capabilities regarding the collection and retention of customer identification information at account creation, including why the Company retains only the last four digits of an identification number and why the system

does not designate or retain the type of identification used (e.g., Social Security number, driver's license, passport).

EOE-71. (ACCOUNT ESTABLISHMENT-FRAUD PREVENTION) Identify and describe all internal controls in place to prevent fraudulent account establishment, including accounts opened by telephone. For each control identified, explain:

a. Whether the control is preventive or detective;
b. Whether it is automated or manual;
c. When in the account establishment process the control is applied;
d. Whether the control is mandatory or may be overridden; and
e. Identify any circumstances under which an account could be established using only a customer's name or otherwise incomplete identifying information and explain the controls that would detect or prevent that occurrence.

EOE-72. (FREQUENCY AND TRACKING OF FRAUDULENT ACCOUNTS) Provide, for each year from 2018 to present, the number of customer accounts identified as fraudulent, including those resulting from identity theft or insufficient identity verification at account creation. Please also describe how the Company tracks and categorizes such incidents internally.

EOE-73. (ACCOUNT ESTABLISHMENT-PROCESS CHANGES) Identify and describe any changes made since 2018 to the Company's identity verification processes, systems, or internal controls in response to known fraud incidents, including the rationale for such changes and any evaluation of their effectiveness.

EOE-74. (CUSTOMER BURDEN AND REMEDIATION PROCESS) Describe the process by which a customer disputes a fraudulent account, including all documentation required (e.g., police reports, notarized statements), and explain why such requirements are necessary. Additionally, quantify the average time required to resolve such disputes and any steps taken to reduce customer burden.

EOE-75. (FINANCIAL IMPACT AND COST RECOVERY) Quantify the total costs incurred by the Company associated with fraudulent account activity (including write-offs, administrative costs, and collections activity) for each year from 2018 to present and explain whether and how such costs are recovered through rates.

EOE-76. (ACCOUNTABILITY FOR SYSTEM LIMITATIONS) Does the Company's customer information systems require entry and retention of specific type of identification used to establish an account? If not, please explain why the Company's customer information systems do not require entry and retention of the specific type of identification used to establish an account, and identify any plans, timelines, or cost estimates to implement such functionality.

EOE-77. (COLLECTIONS-LATE PAYMENTS) For each year since the Company's last rate case (through the present), provide in an Excel spreadsheet format, a monthly summary of late payments both (1) issued and (2) collected by customer class. Please include both the counts and summarized amounts.

EOE-78. (CUSTOMER SERVICE) Please provide the specific wait times, broken down by month and year, that customers encounter when being transferred from the Company's call center to a third-party call center and/or credit and collections, since the last rate case (to present).

EOE-79. (CUSTOMER SERVICE) Provide a written flowchart of the Company's automated or IVR system detailing all the options and/or paths that are offered to customers. Specifically indicate when customers are routed to third-party and/or credit and collections vendors for calls.

EOE-80. (RECEIVABLES) Provide a breakdown of Eversource top 25 active receivable accounts, for both residential and commercial/industrial. For each account, provide the following information:

a. The total amount owed;
b. The total duration of the debt;
c. The date the account was initiated; and
d. The reason(s) why the Company has not terminated service.

EOE-81. (PAYMENTS) Have there been any changes in the procedures or technologies utilized by Eversource to more timely identify customers demonstrating slow payment patterns or other signs of credit trouble? Please describe all ways in which the Company reaches out to these customers.

EOE-82. (PAYMENTS) Describe the order in which a partial payment is applied if a customer owes for unregulated charges.

a. Specifically, is the partial payment applied first to regulated charges then unregulated charges? If not, why?
b. Is the partial payment applied in the same when a customer has received a termination notice? If not, please outline the order in which the payment is applied.

EOE-83. (ARREARAGES AND TERMINATIONS) Provide the following information.

a. Since the last rate case to present, provide a breakdown on a monthly basis which indicates the number of customers that were 60 days, 90 days, and 120 days delinquent.
b. Indicate the number of customers terminated in that particular month due to delinquent account status.

EOE-84. (CALLS) Provide the following:

a. Does the Company track the number of customers using callback technology?

b. If applicable, how many customers received a call back (by year) since the Company's last rate case to present?

c. Does the Company track if every customer who requests a call back receives one? If yes, provide the "success rate" (i.e., number of callers requesting call back versus those who receive a call back and answer it) of call backs for each year since the Company's last rate case to present.

EOE-85. (PAYMENT LOCATIONS) Provide the locations and hours of operation for all third-party bill payment sites and indicate how and when this information is provided to customers.

EOE-86. (TERMS AND CONDITIONS) Does Eversource reserve the right to refuse service to an applicant who is indebted to the Company for any service previously furnished? If so:

a. Does Eversource refuse service to an applicant with a documented serious illness or life-threatening illness? Explain.

b. Does Eversource allow such an applicant to make a payment arrangement on their previous balance as a means of establishing service? Explain.

EOE-87. (TERMINATIONS) Separately provide by month, the total number of residential customers whose service was terminated since the last rate case to present.

EOE-88. (TERMINATION NOTICES) Exhibit CLP-REVREQ-2, Schedule H-2.0(B).

a. Does Eversource include any unregulated charges on its termination notice? If yes, provide a copy of the Company's termination notice, filled out completely as if it were being sent to a typical residential customer, with the unregulated charges highlighted.

b. Are unregulated charges included in the amount that must be paid to avoid termination?

c. Does the Company notify customers regarding unregulated charges prior to a termination notice? If yes, when does the Company notify customers and how frequently?

EOE-89. (TERMINATION NOTICES) Exhibit CLP-REVREQ-2, Schedule H-2.0(B). Before terminating a customer's service, does the Company mail a termination notice via first class mail to that customer? If yes, please describe the process the Company has in place to ensure this occurs. If no, please indicate how the Company contacts the customer.

EOE-90. (TERMINATION NOTICES) Exhibit CLP-REVREQ-2, Schedule H-2.0(B). Provide the following information regarding customers enrolled in e-billing.

a. Are e-billing customers also provided termination notices by United States mail?

b. Describe how and when the Company issues termination notices to its customers that participate in the Company's e-billing system.

EOE-91. (CONSUMER AFFAIRS) Can a customer view their bill online if they receive a paper bill?

EOE-92. (ESTIMATED BILL) Exhibit CLP-REVREQ-2, Schedule H-2.0(C). Provide a copy of the Company's estimated bill form, filled out completely as if it were being sent to a typical customer. Include a copy of any written information that accompanies the second consecutive estimated bill.

EOE-93. (HARDSHIP) Describe the process(es) that the Company uses to educate customers regarding hardship designation and associated benefits and payment arrangements. Please include copies of all material currently provided to customers regarding hardship and its corresponding payment arrangements.

EOE-94. (PAYMENT ARRANGEMENTS) Describe the process(es) the Company uses to educate customers regarding non-hardship payment arrangements. Please include copies of all materials currently provided to customers regarding all non-hardship payment arrangements.

EOE-95. (COMPLAINTS) Please explain how the Company defines what is considered as a customer complaint.

EOE-96. (COMPLAINTS) For each year since the last rate case to present, please identify the:

a. Number of complaints the Company received; and

b. Top five issues contained in complaints received, including the number of complaints received regarding each issue.

EOE-97. (OUTREACH) Describe all the ways in which the Company engages in community outreach. Further discuss:

a. The role community outreach plays in customer service;

b. List all community liaisons the Company uses; and

c. Explain the role of account managers in community outreach.

EOE-98. (BAD DEBT EXPENSES AND RESERVES) For each year since the last rate case (through present), provide in an Excel spreadsheet format, a monthly bad debt roll-forward by customer class, inclusive of the following information:

a. Month and year

b. Customer Class

c. Hardship Status

d. Beginning Reserve

e. Monthly Expense/Write-offs

f. Monthly Reversal/Collections

g. Ending Reserve

EOE-99. (E-BILLING) Exhibit CLP-REVREQ-2, Schedule H-2.0(A). Provide copies of all screen-shots that a standard residential customer participating in e-billing would view when accessing and reading a monthly bill from the Company.

EOE-100. (ESTIMATED BILLING) Exhibit CLP-REVREQ-2, Schedule H-2.0(C). For each year since the prior rate case (through present), provide in an Excel spreadsheet format, a monthly summary of estimated bills issued to ratepayers by customer class. Please include both the counts and summarized amounts.

EOE-101. (METER READING) Exhibit CLP-REVREQ-2, Schedule H-2.0(C). Since the prior rate case (through present), indicate the percentage of customer meters that have not been read for the following time periods:

a. 1 to 3 months;
b. 4 to 6 months;
c. 7 to 11 months;
d. 12 months or greater.

EOE-102. (APPOINTMENTS) Exhibit CLP-REVREQ-2, Schedule H-2.0 (D). What are the Company's procedures when it cannot keep a scheduled appointment?

EOE-103. (APPOINTMENTS) Exhibit CLP-REVREQ-2, Schedule H-2.0 (D).

a. Does the Company maintain a record of its service appointments kept or missed? If so, please provide a copy of the record for every year since the last rate case (to present) and indicate by month for each year how many appointments the Company has failed to keep as scheduled and what those appointments were for (e.g., establish new service, etc.).
b. For the same time period, describe in detail all actions the Company has taken to manage the number of missed appointments.
c. Please describe the procedure by which and time frame in which the Company notifies customers it will miss a scheduled appointment.

EOE-104. (APPOINTMENTS) Exhibit CLP-REVREQ-2, ScheduleH-2.0 (D).
Regarding after-hour and weekend appointments, what is the earliest and latest times that the Company will offer an appointment?

EOE-105. (POLICIES AND PROCEDURES) Exhibit CLP-REVREQ-2, Schedule H-2.0 (F). Provide the Code of Business Conduct referenced on p. 15. If this has already been provided in this matter, please indicate where.

EOE-106. (POLICIES AND PROCEDURES) Exhibit CLP-REVREQ-2, Schedule H-2.0 (F), p. 61. Provide the total number of instances, by month, that the Company has suspended service terminations due to extreme temperatures and severe weather since the Company's last rate case to present.

EOE-107. (BUDGET BILLING) Does the Company reevaluate a customer's budget billing amount only once every six months? Please list all exigent circumstances that could cause a customer's budget billing amount to be reevaluated. Further, please provide all policies, procedures, and documentation provided to customer service representatives (CSRs) regarding budget billing.

EOE-108. (UNCOLLECTIBLES) Exhibit CLP-REVREQ-2, Schedule G-2.18, Uncollectible Data. For each residential and commercial account listed, provide the age of the debt, describe the circumstances that resulted in the delinquency, and the Company's attempts to collect the amount owed. Further provide the collection costs associated with each account listed (i.e., attorney fees, mailing costs, interest, and collection agencies).

EOE-109. (COMMUNICATIONS) Exhibit CLP-REVREQ-2, Schedule H-2.0(B). Does the Company annually provide new customers and existing customers with an explanation of rights, as described in § 16-3-100(c)(1)(B) of the Regulations of Connecticut State Agencies? Describe in detail if the explanation of rights is made available electronically to e-billing customers, or in writing for customers without online access.

EOE-110. (ESTIMATED BILL) Exhibit CLP-REVREQ-2, Schedule H.2.0(C). How does the Company make customers aware of the availability of a payment arrangement as provided for in Conn. Agencies Regs. § 16-3-102(D)(2)?

EOE-111. (SECURITY DEPOSITS) Please provide a copy of the Company's security deposit procedures for non-residential customers.

EOE-112. (SECURITY DEPOSITS) Does the Company provide a written copy of its policies and procedures to a non-residential customer who is required to provide a security deposit? Separately discuss how that information is provided to the customer.

EOE-113. (COMMUNICATIONS) Exhibit CLP-REVQ-2, Schedule H-2.0(E). If requested, how are customers provided a copy of the Company's terms and conditions? Are written copies made available to customers without online access?

EOE-114. (CALL CENTER) Provide, on a monthly basis for the last three years, the following telephone answering statistics for the Company's call centers and any third-party call center employed by the Company. Please provide the following information separated by internal and external call centers:

- **a.** ASA;
- **b.** Average call handle time;
- **c.** Number of abandoned calls;
- **d.** Abandoned call rate;
- **e.** Average time spent in an IVR queue;
- **f.** Average number of employees answering calls; and

g. Ratio of calls to customer service representatives.

EOE-115. (FLEXIBLE PAYMENT ARRANGEMENTS) Please describe how the Company determines the monthly required monthly payment for Flexible Payment Arrangements (FPAs), which have a flat monthly payment.

a. During an 18-month payment arrangement, does the Company reassess the flat monthly requirement payment amount? If yes, how frequently does the Company reassess the payment amount and how does the Company determine the new requirement payment amount?

b. Please provide the number of customers who continue to have an arrearage after successful completion of their FPA for every year since 2024, broken down by residential customers (hardship and non-hardship) and non-residential customers.

c. Of the customers included in (b) above, please provide the number of customers with arrearages within certain ranges (e.g., $1 – 100, $101 - $500, etc.).

EOE-116. (CUSTOMER CALLS-REVIEW) Provide any policies, procedures, guidance, review templates, or other information that details the attributes evaluated by management during its review of customer calls.

EOE-117. (CUSTOMER CALLS-REVIEW) Provide an unlocked Excel spreadsheet detailing the customer calls that the Company has reviewed from January 1, 2025, through December 31, 2025. As part of the information, please provide available details including, but not limited to the CSR, the call date/time, the call type, the review date, internal or external CSR, and the review results.

EOE-118. (CUSTOMER SERVICE SYSTEM FLOWS) Provide both a listing of customer service-related applications and a systems flowchart detailing the interactions between the various applications. As part of the response, please discuss each system and identify the type of information contained within the system.