Date Filed: October 06, 2026

Witness: Warren R. Boutin
Request from: ALLCO

Question:

For every interconnection project completed from 2017 through 2025 for which no final accounting or reconciliation has been performed: (a) state the number of such projects by year and the aggregate amounts collected from the interconnecting customers for them, including the aggregate percentage overhead components; (b) state the aggregate amount of those collections the Company still holds and the account or accounts in which they are recorded; (c) state whether the Company contends that no refunds would be due on those projects if final accountings were performed, and the basis for that contention; and (d) state each reason final accountings were not performed for those projects and who is responsible for deciding whether and when they are performed.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the Company is required to perform final accountings. Section 1.2 of the PURA-approved Interconnection Guidelines states, in part, "At the conclusion of the project, the EDC will reconcile actual vs. estimated cost and reimburse or bill the Generator accordingly." In addition, Section 5.3.2 of the PURA-approved form of Interconnection Agreement, requires the EDC to provide a final accounting report after the facility is first connected to the electric power system.