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**
		:	**NOVEMBER 19, 2026**

THE OFFICE OF CONSUMER COUNSEL'S
THIRTY-SEVENTH 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 **December 3, 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-1081 through OCC-1124 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-1081. (POLE ATTACHMENTS) For each year since and including 2022 to 2026 (through October 30, 2026), please provide an exhibit showing the number of pole applications received by Eversource by batch size, such as 1 to 50 applications per batch; 50 to 100; 101-300; 301 to 500; 501 to 750; 750 to 1000; 1000 to 2000; 2000 to 3000; 3000 to 5000, 5000 to 7000, 7000 to 10,000, more than 10,000.

OCC-1082. (POLE ATTACHMENTS) Do the number of pole applications per batch impact the cost of processing the permit applications on a per pole basis? Please explain the reasoning of the response.

OCC-1083. (POLE ATTACHMENTS) Please explain whether Eversource experiences differences in cost in processing a permit application based on whether a communications provider self-identifies as cable company or telecommunications provider.

OCC-1084. (POLE ATTACHMENTS) Please explain whether Eversource experiences differences in cost in performing engineering work for a new pole attachment based on whether a communications provider self-identifies as cable company or telecommunications provider.

OCC-1085. (POLE ATTACHMENTS) Please explain whether Eversource experiences differences in cost in processing make-ready applications based on whether a communications provider self-identifies as cable company or telecommunications provider.

OCC-1086. (OVERLASHING) For purposes of this interrogatory, overlashing refers to the attachment of additional wires and/or cables to existing communications facilities that already are attached to a pole. Does Eversource consider an overlash by an existing attacher to be a separate pole attachment?

OCC-1087. (OVERLASHING) Does Eversource consider an overlash by a third party attacher conducted with the permission of an existing attacher to be a separate pole attachment?

OCC-1088. (OVERLASHING) Please describe the impact that overlashing has on pole weight and capacity.

OCC-1089. (OVERLASHING) Does overlashing add any long-term costs to the pole owners in terms of increasing weight capacity of a utility pole? Please elaborate on the response.

OCC-1090. (OVERLASHING) What prior notification does Eversource require of communications attachers that plan to overlash onto its existing wires?

OCC-1091. (OVERLASHING) How does Eversource in its role as single-pole administrator determine whether an overlash would create a capacity, safety, reliability, or engineering issue?

OCC-1092. (OVERLASHING) Does Eversource charge a fee to the party seeking to overlash for the review of a proposed overlash?

OCC-1093. (OVERLASHING) If the overlasher is Frontier, a Verizon Company (formerly SNET), does Eversource independently determine whether an overlash would create a capacity, safety, reliability, or engineering issue?

OCC-1094. (OVERLASHING) On a typical utility pole in an urban area in Eversource's service area, how many communications providers have used overlashing of their wires or cables?

OCC-1095. (FRONTIER) Frontier, a Verizon Company, has applied to the FCC for expedited approval of retiring its copper wire network, which appears to have been overlashed by Frontier fiber in portions of Connecticut. From the perspective of a pole owner and SPA, would it be preferable to have the copper wire network removed from utility poles when Frontier does retire all or a significant portion of its copper wire network?

OCC-1096. (POLE ATTACHMENTS) Does Eversource recover all its costs for performing make-ready work for attachers? Please elaborate on your response if additional cost recovery is required.

OCC-1097. (POLE ATTACHMENTS) Does Eversource recover all its costs for performing engineering work for attachers? Please elaborate on your response if additional cost recovery is required.

OCC-1098. (POLE ATTACHMENTS) When a utility pole must be replaced for height purposes only to accommodate a new attacher, how does Eversource allocate the cost of that pole replacement among all attachers?

OCC-1099. (POLE ATTACHMENTS) When a utility pole must be replaced for height purposes only to accommodate a new attacher but upon review Eversource determines that the pole needs to be replaced for NESC compliance purposes, does Eversource allocate the cost of that pole replacement among all attachers? If so, please elaborate.

OCC-1100. (POLE ATTACHMENTS) From Eversource's perspective as pole owner and SPA, what differences, if any, are there between communications provider attachers self-identified as cable companies or telecommunications providers?

OCC-1101. (POLE ATTACHMENTS) Please describe the major challenges facing Eversource as pole owner and SPA over the next 5-10 years and how those challenges could impact operational costs?

OCC-1102. (SVT) Referring to PURA's Decision in Docket No. 21-07-09, the pilot Single Visit Transfer ("SVT") program has been ongoing since its inception. Does Eversource find that the SVT pilot program has been effective in Eversource's service area in completing communications attachers' wire transfers? Also, if the SVT pilot has resulted in any cost-savings to Eversource operationally, please document those cost-savings as part of the response.

OCC-1103. (POLE ATTACHMENTS) Of the pole attachment applications received in 2025, how many were pre-engineered applications?

OCC-1104. (POLE ATTACHMENTS) Of the pole attachment applications received to date in 2026, how many were pre-engineered applications?

OCC-1105. (POLE ATTACHMENTS) Would requiring pre-engineered applications allow the Company to expedite the application process?

OCC-1106. (POLE ATTACHMENTS) Would requiring pre-engineered applications reduce overall costs to the Company and ratepayers?

OCC-1107. (POLE ATTACHMENTS) What system or other changes would be required for the Company accommodate a significant increase in pre-engineered applications? Please explain and quantify.

OCC-1108. (POLE ATTACHMENTS) Does the Company use pre-engineered applications in any of the other jurisdictions in which it does business? If yes, please explain the pre-engineering process in that jurisdiction, including cites to applicable regulatory decisions, regulations, and/or statutes.

OCC-1109. (EV) Does the Company have electric vehicles ("EVs")? If yes, please provide a listing with Manufacturer, model, model year, price, and date in service.

OCC-1110. (EV) Is the Company planning to expand its electric vehicle fleet?

OCC-1111. (EV) Where does the Company acquire its EV vehicles from? Please provide dealership and location in the response.

OCC-1112. (EV) Are EVs being acquire from a different source compared to internal combustion engine vehicles (ICE)?

OCC-1113. (ICE) Where does the Company acquire its ICE vehicles from? Please provide dealership and location in the response.

OCC-1114. (MANHOLE COVER) Is the Company replacing manhole covers? If yes, please provide background as to why the Company decided to pursue a program such as this.

OCC-1115. (LOCAL SPENDING) Does the Company agree that its spending drives economic activity and can help the local economy?

OCC-1116. (LOCAL SPENDING) Does the Company have a policy to try to spend capital on local (CL&P rate paying) businesses when goods or labor are widely available and costs are reasonable?

OCC-1117. (LOCAL SPENDING) Would the Company be opposed to a policy to try to spend capital on local (CL&P rate paying) businesses when goods or labor are widely available and costs are reasonable?

OCC-1118. (ACCOUNT NUMBERS) Referring to Interrogatory OCC-914 Response. Is it correct that customers do not create their own Company account numbers?

OCC-1119. (ACCOUNT NUMBERS) Referring to Interrogatory OCC-914 Response. Is it correct that all account numbers are created by Company computer software and or Company employees?

OCC-1120. (ACCOUNT NUMBERS) Referring to Interrogatory OCC-914 Response. Is it correct that if multiple account numbers are created for a customer this is because Eversource created the account numbers not the customer?

OCC-1121. (ACCOUNT NUMBERS) Referring to Interrogatory OCC- 914 and OCC-999 Responses. For years 2021 –2026, in an unlocked Excel spreadsheet provide a list of customer accounts that the Company provided correcting payment transfers to the correct customer account. Include the total amount transferred, total number of transfers, and instances per account.

OCC-1122. (ACCOUNT NUMBERS) Referring to Interrogatory OCC- 914 and OCC-999 Responses. If the Company cannot provide reports for email requests and there is no way to isolate the misapplied payment or payment transfer requests from other payment inquiry requests submitted through the Customer Information System, please explain how the Company can transfer a payment balance to the correct billing account.

OCC-1123. (ACCOUNT NUMBERS) Provide any evidence the Company has ever transferred a payment balance to the correct billing account after the customer provides proof of payment.

OCC-1124. (ACCOUNT NUMBERS) Provide all Company customer representative script and /or procedures regarding if a customer calls the Company about payments to an incorrect account number /wants to have past payments transferred to the correct account.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

Kimberly White
Staff Attorney
10 Franklin Square
New Britain, CT 06051
860.827.2695

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 19th day of November, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court