Date Filed: November 03, 2026

Witness: Warren R. Boutin and Andrew C. Belden
Request from: ALLCO

Question:

(Follow-up to ALLCO-122, ALLCO-132, and ALLCO-135 ― ISO- New England review and Guideline timelines, for applications generally.) State: (a) the statute, regulation, Guideline provision, ISO-New England tariff provision or procedure, or Company practice on which the Company relies for the statement in ICC-005 that ISO-New England review is required for generating facilities "over 1 MW," and the date on which the Company first applied that threshold (ALLCO-122, subpart (b)); (b) whether, and under what circumstances, the Company applies ISO-New England review to applications of 1 MW or less (ALLCO-132, subpart (d); ALLCO-135, subpart (d)); (c) for each year 2018 through 2025, the number of applications for which the Company withheld an executable Interconnection Agreement pending an ISO-New England screening, study, or determination, by size class (≤1 MW; >1 MW to 2 MW; >2 MW to 5 MW; >5 MW), and the average and median elapsed time from application to issuance of an executable agreement for those applications; (d) the metrics, timelines, and milestones contained in the monthly PowerClerk report that management reviews (ICC-010; ALLCO-132, subpart (a)), the recipients of that report, and, for each month from January 2024 to the present, the percentage of applications for which each Guideline timeline was met; and (e) each instance since January 1, 2020 in which the Company has notified the Authority that a Guideline timeline was not met, and the reason stated.

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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Without waiving said objections, generators greater than 1 MW interconnected to the distribution system may be subject to applicable provisions of ISO-NE's Open Access Transmission Tariff

(OATT), Planning Procedures as required by ISO-NE. Please refer to the Company's response to ALLCO-135[i].

Prior Referenced Response:

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[i] ALLCO-135 Question:

(Follow-up to ICC-005 — applications held pending ISO-NE requirements.) The Company's response to ICC-005 states that any generating facility over 1 MW "must comply with ISO-NE rules, including Tariff Section I.3.9 and Planning Procedure 5," and that "[t]he EDC cannot issue an executable Interconnection Agreement until applicable ISO-NE requirements are met." (a) State the date on which the Company first withheld, delayed, or declined to issue an executable Interconnection Agreement on the ground that ISO-NE requirements had not been met, identify the application to which that first occurred, and, if that date differs from the policy adoption date given in response to Q-ALLCO-132(b), explain the difference. (b) Identify, in native (Excel) format, every distribution interconnection application in Connecticut, from January 1, 2018 to the present, to which the practice described in ICC-005 has been applied — that is, every application for which the Company has declined to issue, or has withheld, an executable Interconnection Agreement pending an ISO-NE review, screening, study, determination, or other requirement — stating for each: (i) the application number and PowerClerk identifier; (ii) the nameplate capacity in kW; (iii) the date the application was filed; (iv) the date the Company completed its own Guidelines-process review (or the current Guidelines milestone); (v) the date the Company referred the application to ISO-NE, the ISO-NE process invoked (Section I.3.9 proposed plan application, Planning Procedure 5 screening, Level I/II/III study, or other), and the ISO-NE queue or reference number, if any; (vi) the date of each ISO-NE determination or study result received, and its substance; (vii) the current status of the application with the Company (including whether an executable Interconnection Agreement has been issued and on what date) and with ISO-NE; (viii) the elapsed time from application filing to the issuance of an executable Interconnection Agreement, or to the present if none has been issued; and (ix) whether the applicant was notified in writing that the executable Interconnection Agreement was being withheld pending ISO-NE requirements, and on what date. (c) For each application listed in (b) that was subsequently withdrawn, cancelled, or deemed withdrawn, state the date and the stated reason. (d) State the number of applications in (b) that are 1 MW or less, and for each explain why the ISO-NE requirements described in ICC-005 for facilities "over 1 MW" were applied.

[i]ALLCO-135 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.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Without waiving said objections, the Company complies with the requirements of the PURA-approved Interconnection Guidelines. Please refer to the Company's response to ALLCO-132i.