Date Filed: September 18, 2026

Witness: Amparo Nieto
Request from: CLF and Sierra Club

Question:

For the Test Year provided by the Company in this rate case, please provide (a.) the Company's calculation of the cost of service (i.e., cost to serve) attributable to residential electric customers with a heat pump as their primary heating source, in the aggregate, together with (b.) a detailed description of the methodology used to develop this cost of service figure, as well as (c.) data sources, allocators, and assumptions used, in live Microsoft Excel format with all formulae unlocked. If the Company's cost of service calculations use a different period than the one specified above, please identify the period actually used. If the Company does not possess the information necessary to calculate the cost of service for heat pump customers, please explain in detail why not. If the Company is unable to produce this figure for the Test Year, but is able to do so for a different time period, please use the same time period used to satisfy CLF-SC-3, and CLF-SC-4.

Response:

The Company ACOS study does not calculate the cost to serve a residential customer (assuming the total, or whole house requirements) with a heat pump as their primary heating source. Please refer to the Company's responses to CLF-SC-003[i], and CLF-SC-004[ii]. The ACOS study only allocates costs to rate classes with existing customers and billing determinants as defined by such rate classes. Conceivably, a new class or subclass of service would need to be defined and all data similar to that relied upon and used in the filed cost of service study (including but not limited to appropriate load data and distribution facility service, utilization and cost characteristics) for rate classes in that study would be required to conduct a similar allocation of costs among all rate classes reflective of such new class or subclass.

Prior Referenced Responses:

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[i] CLF-SC-003 Question:

For the Test Year in this proceeding, please provide:

a. the number of residential electric customers with a heat pump as their primary heating source;

b. the total electricity consumption (kWh) of these customers;

c. the total electric delivery revenue attributable to these customers, in the aggregate.

The Company may provide this information either as a summary table or as the underlying billing and customer data necessary to derive it (e.g., anonymized billing-quality data identifying each customer's heating source, together with that customer's kWh consumption and delivery revenue for the period). Please provide this information in CSV format or in live Microsoft Excel format (with all formulae intact). If the Company does not possess the information necessary to produce any of the three items requested (heat pump customer count, consumption, or delivery revenue), please state specifically which item(s) the Company is unable to provide, and explain in detail why not for each. If the Company is not able to produce all three items requested for the Test Year, but is able to do so for a different time period, please provide these figures for the most recent time period available.

CLF-SC-003 Response:

Since the Company does not track the heating sources of its customers, the Company has evaluated data collected from Energy Efficiency rebates issued to customers who (1) installed a qualifying heat pump at their residence and (2) submitted for a rebate. This information does not represent all customers who may have heat pumps.

a. Evaluation of data from rebate program which began in 2023 indicates there have been approximately 4,400 customers who have received heat pump rebates that indicate full displacement of other heat sources and use heat pumps as their primary heating source

b. The Company does not know the total number of residential electric customers utilizing heat pumps as their primary heating source during the Test Year and accordingly is unable to query those customers' total kWh consumption or determine or estimate total delivery revenue.

c. Refer to the Company's response to subpart (b), above.

[ii] CLF-SC-004 Question:

For the same Test Year specified in the preceding request, please provide the number of residential electric customers, total electricity consumption (kWh), and total electric delivery revenue, broken out separately for the residential customer groups whose primary heating is:

a.electric resistance

b.natural gas

c.delivered fuels (e.g., fuel oil, propane)

d.other/unknown heating sources

Please provide this information in the same format requested in the preceding request. If the Company does not possess the information necessary to produce any of the three items requested (customer count, consumption, or delivery revenue) for any of the residential customer categories listed above, please state specifically which items and/or categories the Company is unable to provide, and explain in detail why not for each item and category identified. If the Company is not able to produce all three items requested for each category for the Test Year, but is able to do so for a different time period, please provide these figures for the same time period as is used in CLF-SC-3.

CLF-SC-004 Response:

Since the Company does not track the heating sources of its customers, the following response used best available data collected from multiple sources to approximate the following amounts for this request.

a. For the Test Year 2025, the Company provided electric service to 135,073 customers on Rate 5 Residential Electric Heating Service. While there may be customers serviced under Rates 1 or 7 who heat with electric resistance, the customer count of Rate 5 provides a definitive measure of those customers with electric space heating.

   For the Test Year 2025, the total electricity consumption of these customers was approximately 1,594,819,665 kWh

   For the Test Year 2025, the Company calculated an estimated total delivery revenue, using average Rate 5 delivery rate[ii] for 2025, of approximately $289,698,992.

b. The Company estimates that for the Test Year, 2025, there are approximately 31,548 CL&P Residential customers received service under either the Yankee Gas Rate 2 Residential Heating rate or the Yankee Gas Rate 3 Residential Multi-Dwelling rate, and who therefore may be assumed to heat using natural gas. The Company cannot account for any customers who may receive natural gas from any company other than Yankee Gas Company.

   For the Test Year 2025, the total electricity consumption of these customers was approximately 177,787,876 kWh.

   For the Test Year 2025, the Company calculated an estimated total delivery revenue, using an average Residential delivery rate[ii] for 2025, of approximately $34,721,972.

c. For the Test Year 2025, the Company estimates there are approximately 2,089 CL&P Residential customers who receive service under the Yankee Gas Rate 1 Residential Non-Heating rate that are not on CL&P Rate 5 Residential Electric Heating Service. Therefore, it may be assumed that these customers are heating with delivered fuels (e.g. fuel oil, propane). The Company cannot predict the heating source of any other customers.

   For the Test Year 2025, the total electricity consumption of these customers was approximately 10,915,087 kWh.

   For the Test Year 2025, the Company calculated an estimated total delivery revenue, using an average Residential delivery rate[ii] for 2025, of approximately $2,131,716.

d. This information is not available.