STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

November 3, 2026
In reply, please refer to:
Docket No. 26-05-10

Vincent Pace, Esq.
Assistant General Counsel
Eversource Energy Service Company
P.O. Box 270
Hartford, CT 06141

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Attorney Pace:

Enclosed are interrogatories numbered **RSR-83 through RSR-101** and **RRU-199 through RRU-211** directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Company) and refer to the Company's request to amend its rate schedules.

The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) 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 **November 17, 2026, at 4:00 p.m.** The Authority encourages the submission of responses as soon as they are available rather than delaying until all answers are completed. **Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.**

Similarly, each Late Filed Exhibit that may be submitted after hearing in this docket shall be sequentially numbered and identified with the Docket Number, Late Filed Exhibit Number, page number, the name of the company and the person responsible for the exhibit, and the date of submission.

If a response to any of the requested information has already been filed in response to another Parties' interrogatory(ies) 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.

ELECTRONIC SUBMISSION OF FILINGS

IMPORTANT NOTE: The Authority has indefinitely suspended the paper copy filing requirement. Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to the Electronic Filing webpage for more information, including on confidential materials: Make An Electronic Filing

CONFIDENTIAL DOCUMENTS

No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by emailing the material to Jeff.Gaudiosi@ct.gov 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 electronically.

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 must be appended to the Motion. The Authority will rule on the Motion forthwith, and it will give further direction as necessary.

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

By the Direction of the Authority,

PUBLIC UTILITIES REGULATORY AUTHORITY



Jeffrey R. Gaudiosi, Esq.
Executive Secretary

Enclosure
cc: Service List

DOCKET NO. 26-05-10
APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES

Interrogatories RSR-083 through RSR-101 are directed to the Connecticut Light and Power Company d/b/a Eversource Energy (Eversource or Company) and refer to the Company's Rate Case Application (Application).

RSR-083 (STORMS) Application, Ex. ACCT-1. Separately provide the catastrophic storm and pre-staging accruals on a monthly basis starting with a beginning balance as of December 31, 2023, until the start of the proposed rate year.

RSR-084 (STORMS) Application, Ex. ACCT-1. Regarding the provided accrued customer contributions to the storm fund, explain how the amounts were calculated for the monthly contributions that occurred from February 2024 through April 2025.

RSR-085 (STORMS) Application, Ex. CLP-ELP-1, p. 124. Provide quantitative support for the statement that "multi-day high-heat, heavy humidity weather systems can inflict damage and create unanticipated overloads on the distribution system that drive equipment failures and associated customer outages." In other words, using actual heat-based weather events, show how overloads contribute significantly to customer outages and storm damage.

RSR-086 (VEGETATION MANAGEMENT) Interrog. Resp. RSR-15, Att. 1. Provide invoices and supporting timesheets for the selections outlined in RSR-86 Attachment 1 (which were selected from the response to RSR-15).

RSR-087 (VEGETATION MANAGEMENT) Interrog. Resp. RSR-16. Provide the mathematical formulas for how the Company calculated the proposed rate year expenses for the following categories. Describe all assumptions made and support the calculations with documentation and vendor contracts:

a. Roadside Scheduled Maintenance Costs;
b. Tree Removal Costs;
c. Reliability Tree Work Costs;
d. Distribution Rights-of-Way Costs;
e. Emergency Costs;
f. Vines Costs;
g. Emergent Work Costs;
h. Mid-Cycle Costs;
i. CT DOT Collaboration Costs;
j. LiDAR Costs; and
k. Other Costs.

RSR-088 (VEGETATION MANAGEMENT) Ex. VMP-2, p. 32. Provide the following regarding vegetation management-related traffic control costs:

a. Under which subcategory of vegetation management expenses these costs are included; and
b. A breakdown of annual historic traffic control costs for each of the last 10 years.

RSR-089 (VEGETATION MANAGEMENT) Ex. VMP-3, pp. 7-8. Using the percent decreases in outages described in exhibit VMP-3 pages 7-8, provide an analysis showing cost savings that could be reasonably anticipated from the proposed vegetation management program. Provide all assumptions used in the analysis.

RSR-090 (VEGETATION MANAGEMENT) Explain whether the Company has conducted any analysis showing any historical cost savings (i.e., avoided costs associated with reduced customer outages or reduced storm damage). If so, provide the analysis.

RSR-091 (VEGETATION MANAGEMENT) Interrog. Resp. RSR-16. Provide the annual average cost per mile, based on actual costs for each year, for years 2017 through 2026 year to date. If these costs vary for each individual program, provide the information separately for each program.

RSR-092 (VEGETATION MANAGEMENT) Interrog. Resp. RSR-16. Provide the actual number of miles (or other unit of measure) planned to be addressed in the rate year for each of the below programs:

a. Roadside Scheduled Maintenance Costs;
b. Tree Removal Costs;
c. Reliability Tree Work Costs;
d. Distribution Rights-of-Way Costs;
e. Emergency Costs;
f. Vines Costs;
g. Emergent Work Costs;
h. Mid-Cycle Costs;
i. CT DOT Collaboration Costs;
j. LiDAR Costs; and
k. Other Costs.

RSR-093 (VEGETATION MANAGEMENT) Interrog. Resp. RSR-16. Regarding the proposed rate year LIDAR expenses, provide a description for, and an estimate of, anticipated future vegetation management, or other, cost savings.

RSR-094 (VEGETATION MANAGEMENT) Audit-PURA-1 Supplement, Att. 1(f). Explain whether all of vegetation management vendors use the same set of town codes and division codes. If yes, provide all town codes and identify to which towns and divisions they correspond.

RSR-095 (RELIABILITY) Application, Ex. CLP-TSP-3, p. 32. Provide the annual blue sky (i.e., excluding major events) and total system reliability metrics for SAIDI, SAIFI, and CAIDI. For blue-sky metrics, use the following methodologies, with explanations of how each methodology determines major event exclusions:

a. IEEE 1366 Major Event Day;
b. “TDRP Method;” and
c. “RE08 Method.”

RSR-096 (PLANT ADDITIONS) Application Ex. CLP-Additions-4, Project Specifics Post 2022, Line No. 448. Provide all invoices associated with the CTDSOCIT project. Also provide an unlocked Excel worksheet showing a list of the invoices, associated vendor, and service or item purchased.

RSR-097 (PLANT ADDITIONS) Application, Ex. CLP-Additions-4, Project Specifics Post 2022, Line No. 448. Provide the following regarding the Windsor SOC:

a. The total number of job positions and classifications allocated to each section of the facility; and
b. The number of currently filled job positions and classifications the Company has allocated to each section of the facility.

RSR-098 (PLANT ADDITIONS) Provide an unlocked Excel worksheet with all formulas intact showing on a monthly basis the reclassification of costs from FERC Account 107 to FERC Account 101. Provide the information for the period January 1, 2017, through 2026 year-to-date.

RSR-099 (MAKE READY) Ex. REVREQ-4. Reconcile column Z ("O&M Amount") from the selected line items in RSR-99 Attachment 1 (which were selected from selected from Application, Exhibit REVREQ-4), with the invoices in Exhibit REVREQ-4a.

RSR-100 (EXPENSES) Ex. CLP-REVREQ-2, Schedule WP C-3.16. Provide an unlocked Excel worksheet with all formulas intact containing an updated exhibit showing all costs down to the dollar.

RSR-101 (EXPENSES) Ex. CLP-REVREQ-2, Schedule WP C-3.17. Provide an unlocked Excel worksheet with all formulas intact containing an updated exhibit showing all costs down to the dollar.

Interrogatories RRU-199 through RRU-211 are directed at The Connecticut Light and Power Company (CL&P or Company) and refer to the Company's request to amend its rate schedules (Application).

RRU-199 (ACCUMULATED DEFERRED INCOME TAXES (ADIT)) Application, Sch. B-1.0 and Sch. G-1.2. Provide an unlocked Excel worksheet, with formulas intact, that analyzes how ADIT in Accounts 190, 282, and 283 are reflected in the Company's proposed rate base. Include references and amounts applicable to each of the application schedules.

RRU-200 (EXCESS ADIT) Application, Schs. G-1.2, p. 2 and H-1.0, pp. 87-88. Regarding excess ADIT:

a. Discuss and explain how the unamortized excess ADIT balance of $608,841,762 ($933,329,049 - $324,487,287) as of December 31, 2025, in Account 254, affects the rate base for the Test Year and Rate Year. Include references and amounts applicable to each of the application schedules.
b. Provide an unlocked Excel worksheet, with formulas intact, that itemizes components that make up the difference between Account 254 balance of $1,030,599,664 in Schedule G-1.2 and the $608,841,762 referenced in subpart (a) above.

RRU-201 (CUSTOMER ADVANCES FOR CONSTRUCTION) Application, Sch. G-1.2. Explain how the Account 252 balance of $36,718,089 in 2025 is reflected in the Company's rate base. Include references and amounts applicable to each of the application schedules.

RRU-202 (DEFERRED INCOME TAXES) Application, Sch. B-1.0 and Sch. B-6.1. Provide an unlocked Excel worksheet, with formulas intact, that supports calculations of deferred taxes on contributions in aid of construction (CIAC), net of gross-up, of $35,961,000 for the Test Year and $38,004,000 for the Rate Year. Identify accounts containing the related regulatory liabilities and explain if the Company used these amounts to reduce rate base. Include references and amounts applicable to each of the application schedules.

RRU-203 (STORM COSTS) Decision, Apr. 18, 2018, Docket No. 17-10-46, Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules, App. D, Amended Att. 3, Amended Att. 5. Regarding the amounts allowed for the amortization of prior storm costs in the referenced exhibit, provide:

a. An explanation regarding why the Company treats the $27.969 million "Deferred Storm Cost Reserve Recover, Dkt 13-03-23" amortization expense, approved for Rate Year 3 as the final amortization amount for the deferred storm cost allowed in Docket No 13-03-23, Petition of The Connecticut Light and Power Company for Approval to Recover its 2011-2012 Major Storm Costs. If the Company used this amount to reduce subsequent deferred storm costs, provide the related storm proceeding and reference applicable exhibits.
b. An exhibit that summarizes the total amount recovered in distribution rates for the annual amortization expense referenced in subpart (a), above, from May 1, 2021, to date.
c. A detailed explanation for how the Company used the $18.625 million "10/2018 Deferred Storm Recovery" amortization expense approved for Rate Year 3 as the annual amortization amount for post-October 2018 storm costs.
d. An exhibit that summarizes the total amount recovered in distribution rates for the annual amortization referenced in subpart (c), above, from May 1, 2020, to date.
e. An exhibit that summarizes the $3 million annual pre-staging reserve accrual collected in base rates from May 1, 2018, to date. Explain how each annual amount was used. If the Company used the annual pre-staging accrual reserve amount to offset storm costs, provide the related storm proceedings and reference applicable exhibits.
f. An exhibit that summarizes $4.2 million in annual incremental major storm expense collected from May 1, 2018, to date. Explain how each annual amount was used. If the annual reserve amount was used to offset storm costs, provide the related storm proceedings and reference applicable exhibits.
g. For each recovery and amortization discussed above, an exhibit itemizing and reconciling amounts collected in current rates through June 30, 2027, that have been used to reduce storm costs incurred.

RRU-204 (UNCOLLECTIBLE EXPENSE) Application, Sch. C-3.30, Interrog. Resp. EOE-083, Att. 1. Regarding the proposed uncollectible expense for the Rate Year, provide:

a. An unlocked Excel worksheet with formulas intact and in a form and format similar to Attachment 1 of the Company's response to Interrogatory EOE-083, that shows the actual monthly delinquent amounts ($) instead of number of customers, for each of the aged periods;
b. An unlocked Excel worksheet, with formulas intact, that summarizes annual net uncollectible write-offs for 2020 through 2026 to date. Include a breakdown of the annual net-write-offs for portions associated with hardship and non-hardship uncollectible expenses;
c. An exhibit for the annual non-hardship portions quantified in subpart (b), above, that breaks down the annual for portions collected in distribution rates and other rate adjustment mechanisms, i.e., GSC and TAC.

RRU-205 (UNCOLLECTIBLE EXPENSE) Application, Sch. WP C-3.30, p. 2, Interrog. Resp. EOE-088. Regarding the proposed uncollectible expense for the Rate Year, provide:

a. An exhibit that breaks down the annual bad expenses in Schedule WP C-3.30 for portions associated with other regulated charges, such as Energy Efficiency loans, etcetera, that are accounted for separately;
b. An explanation regarding whether the account receivables for regulated charges discussed in subpart (a), above, are included in the Company's total account receivables used to determine annual bad expenses; and
c. A detailed explanation for why bad expenses related to Transmission Adjustment Clause, C&LM, Competitive Transition Assessment Charge, System Benefits Charge, Renewable Energy, and NBFMCC (collectively, rate adjustment mechanism components (RAM Components) should continue to be recovered in base distribution rates and not in rates for these RAM Components.

RRU-206 (DEFERRED INCOME TAXES) Application, Sch. A-1.0, Sch. C-1.0, and Sch. WP C-3.41, pp. 1-3. Regarding the deferred income taxes of $17,595,000 proposed for the Rate Year:

a. Provide an unlocked Excel worksheet, with formulas intact, itemizing components and detailing the calculation of the following timing differences proposed for the Rate Year:
   i. Deferred GET liability of $(8,279,000);
   ii. Tax depreciation of $75,873,474;
   iii. Section 263A costs of $25,823,000;
   iv. Repairs tax deduction of $18,062,400;
   v. CIAC taxable income of $(10,550,000);
   vi. Prepaid pension of $13,656,000; and
   vii. Deferred pole make-ready cost of $5,895,000.
b. Provide an unlocked Excel worksheet, with formulas intact, that shows the detailed calculation of the Federal tax rate change amortization of $6,835,000 proposed for the Rate Year;
c. Provide an exhibit that summarizes the annual CIAC taxable income from 2017 to date; and
d. Explain how the deferred income tax of $21,178,000 affects the Test Year's rate base and how $17,595,000 impacts the Rate Year's proposed rate base.

RRU-207 (CURRENT INCOME TAX) Application, Schs. C-1.0 and C-3.40.

a. Provide an unlocked Excel worksheet with formulas intact that shows the calculation of the reported "Depreciation Flow Through – Plant" of $75,341,000. Include amounts related to each plant-related FERC account.
b. Provide detailed explanation for why the amount in each FERC account is not normalized.

RRU-208 (STORM REVENUE TAX) Application, Sch. C-1.0. Explain the $35,359,106 difference between the proposed storm revenue requirement of $255,110,000 and total associated expense of $219,750,894, which consists of total amortization of $210,101,000 and net income taxes of $9,649,894 ($70,199,894 - $60,550,000).

RRU-209 (WORKING CAPITAL) Ex. CLP-REVREQ-2, Sch. WP B-4.0, Sch. G-1.2, p. 1 and Sch, H-1.0, p. 66. Regarding the proposed material and supplies (M&S) balance for the Rate Year:

a. Provide an unlocked Excel worksheet, with formulas intact, showing the calculation of the 4.726% escalation factor, including all supporting exhibits;
b. Provide an unlocked Excel worksheet, with formulas intact, showing the calculation of the 1.641% escalation factor, including all supporting exhibits;
c. Provide an exhibit listing all of the Company's warehouses and showing for each facility the annual M&S inventory balances as of December 31, 2018, through December 31, 2025;
d. Explain why Schedule WP B-4.0 reports an M&S balance of $151,831,000 as of December 31, 2025, while both Schedule G-1.2 and Schedule H-1.0 show the M&S distribution portion as $132,023,103 for the same period; and
e. Explain why the distribution portion of $112,143,099 ($194,058,877 - $81,915,778) is labeled as "Assigned to – Construction."

RRU-210 (WORKING CAPITAL) Ex. CLP-REVREQ-2, Sch. B-4.0, Sch. H-1.4, and Schs. H1.4a - H-1.4l. Regarding the proposed working capital allowance for the Rate Year:

a. Provide detailed explanation for why the TAC has 36.58 lead days while expenses for other revenue adjustment clauses have 50.31 lead days;
b. Explain what the midpoint of the period and payment dates represent for the TAC;
c. Provide and include the monthly service invoice dates for TAC listed in Schedule WP H-1.4c; and
d. Provide an unlocked Excel worksheet, with formulas intact, in a similar form and format to page 2 of Schedule H-1.4a, detailing the calculation of the monthly account payable turnover and numbers of days account payables that are outstanding each month for 2024 and 2025.

RRU-211 (OVERHEAD ALLOCATION) Discuss and explain if depreciation expenses are included and reflected in the annual construction work-in progress as a result of allocated non-labor overhead costs being capitalized.