Date Filed: October 27, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ALLCO-102 — persons, rates, and prior review.) ALLCO-102 asked the Company to identify each person who established, calculated, approved, or revised the overhead loader percentages and each person or group with authority to approve deviations (subpart (a)); to state whether each loader was developed by CL&P, ESC, Burns & McDonnell, or another entity (subpart (c)); and to state whether any loader was reviewed for consistency with actual incurred costs before December 2024 (subpart (d)). The response names four departments and attaches a methodology document "Last Updated: 5/16/25." State: (a) by name and title, each person in the ESC Investment Planning, Corporate Accounting, Plant Accounting, and Accounts Payable departments who calculated or approved the CL&P rate for each cost element (ZNP, ZPB, ZGS, ZST, ZLO, ZMI, ZAS, ZEL, ZEB, ZVE, and any other loader applied to distribution construction work orders) in each year 2017 through 2026, and each person or group with authority to approve a deviation; (b) the rate for each such cost element in effect for CL&P in each year 2017 through 2026, with the effective date of each change, in native format; (c) the annual rate-calculation workpapers for each cost element for 2017 through 2026; (d) each version of the methodology document in force before May 16, 2025, and the changes made on that date; (e) whether any loader was developed, recommended, or benchmarked by Burns & McDonnell or any other outside firm, identifying the firm and the engagement; and (f) the answer to subpart (d) of ALLCO-102 — whether any loader percentage applied to interconnection charges was reviewed for consistency with actual incurred costs before December 2024, identifying each review, its date, author, and conclusion.

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.