Date Filed: October 27, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ALLCO-102, Attachment 1 — application of the clearing-rate loaders to customer-funded work orders.) ALLCO-102, Attachment 1 states that the Administrative Salaries & Expense (AS&E) overhead "is applied to all capital work order charges … excluding the following: CIAC, Reimbursables, AFUDC, Salvage, UVLs and AS&E," and that the AS&E, Miscellaneous Distribution Expense Capitalization (MDEC), and Engineering & Supervision (E&S) rates are "fixed clearing rate[s]" maintained "to maintain a balance equal to $0 to +/- 1 month of activity in the clearing work orders." State: (a) whether the exclusion of "CIAC" and "Reimbursables" from the AS&E base refers to cost elements credited to a work order or to work orders that are funded by customer contributions or reimbursements, and identify the cost elements (A21, A61 through A69, LCO, M15, U01 through U10, UVL, ZAS, Z02) to which the words "CIAC" and "Reimbursables" correspond; (b) whether AS&E, MDEC, E&S, ZPB, ZGS, ZNP, and ZVE were applied, in each year 2017 through 2025, to work orders for distributed-generation interconnection facilities and upgrades whose cost is reimbursed in whole or in part by the interconnection customer, and the authority (tariff, Guideline provision, Authority order, or Company policy) for doing so; (c) whether the amount loaded to a customer-reimbursed interconnection work order by a clearing-rate loader represents costs incurred for that work order or a pro-rata share of a company-wide pool of costs that would otherwise be allocated to the Company's own capital projects; (d) whether amounts recovered from interconnection customers through those loaders are credited to the corresponding clearing work orders — thereby reducing the overhead allocated to projects in Exhibits CLP-ADDITIONS-1 through -6 and in rate base — or are retained by the Company, identifying the accounting entries; (e) the total amount of each loader recovered from interconnection customers in each year 2017 through 2025; and (f) the mechanism by which the indirect and overhead amounts shown on the distributed-generation interconnection project closing reports in Exhibit CLP-ADDITIONS-6 Supplemental (filed October 1, 2026) come to range from roughly 40 percent to more than 130 percent of direct cost, and whether the Company contends that each such amount reflects costs actually incurred for the project on which it was charged.

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.