Date Filed: October 27, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ALLCO-103 and ALLCO-112 — final accountings.) The Company states that the final-accounting process "is performed manually and is not tracked or maintained in PowerClerk," that the data "is entered and tracked across multiple systems," and that Section 1.2 of the Interconnection Guidelines provides that "[c]ost estimates provided to applicants will be subject to a six-month true-up." State: (a) each system in which final accountings, reconciliations of estimated to actual cost, and resulting refunds or bills are recorded, and the fields each maintains; (b) the department and the persons (by title) responsible for performing final accountings and for issuing final-accounting reports to interconnection customers, and the number of full-time equivalents assigned to that function in each year 2017 through 2025; (c) for each year 2017 through 2025, the number of distributed-generation interconnection projects for which Company construction was completed, and of those the number for which a final accounting was issued within six months of completion, within one year, and more than one year after completion, derived from whatever system or records are available; if the Company contends it cannot derive these figures, state the number of person-hours it estimates the review would require and the records that would have to be consulted; (d) whether the Company has any process, report, metric, or control for monitoring compliance with the six-month true-up in Section 1.2, and if so identify it and produce the most recent output; and (e) whether the Company has ever reported to the Authority, in any docket or compliance filing, the number or timeliness of interconnection final accountings, identifying each.

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.