Date Filed: October 26, 2026

Witness: David L. Gladey, Lavelle Freeman, John P. Dipaola-Tromba, Jennifer A. Schilling and Elli Ntakou
Request from: Department of Energy and Environmental Protection

Question:

(Integrated Distribution System Plan) Refer to Exhibit CLP-TSP-1, Exhibit CLP-TSP-1, p. 69. Please explain further the Company's statement that "the Companies have provided their version of the IDSP with reduced scope". Provide specifics on where the Company's TSP differs in scope from the Authority's Version in Docket No. 21-05-15RE03.

Response:

Based on the question, the Company clarifies the comment referenced in Exhibit CLP-TSP-1, at page 69. The "reduced scope" version of the IDSP referenced here refers to the Company's response to a proposal issued by PURA on what the IDSP should include, not the TSP submitted in this filing.

The Company submitted a proposal for a reduced scope version of the IDSP[1] for PURA to consider in Docket No. 21-05-15RE03, in order to focus on customer affordability and delivering benefits at a lower cost, with the key focus on:

1. A more contained and streamlined stakeholder process;

2. A reduced number of scenarios for the Company to consider and develop as part of planning; and

3. A more limited granularity of system modeling and forecasting.

PURA, in its most recent proposed final decision, made certain modifications to the requirements (with the exception of the stakeholder process) that align with the Company's request ask for two incremental FTEs as part of this filing (please refer to the Company's response to OCC-835[i]).

[1] The Company filed this proposal as written exceptions in response to the draft decision for Docket 21-05-15RE03 on Aug 28th 2025. Please see the link to the document: https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/6ec4c362aab351ff85258cf400701215/$FILE/Docket%20No.%2021-05-15RE03%20-%20UI%20CLP%20Joint%20Written%20Exceptions%208.28.25.pdf

In the Company's response to OCC-566[ii], the Company has provided a more detailed mapping of its TSP content (which is not the IDSP) to the IDSP proposed outline.

Prior Referenced Responses:

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[i] OCC-835 Question:

Payroll. Refer to the response to OCC-333 which states that of the 41 new positions requested, 21 vegetation management, 5 power quality positions and 2 distribution planning and forecasting positions are contingent on PURA's approval in this case. If they are contingent on PURA's approval, explain how these positions are necessary.

OCC-835 Response:

For the 21 vegetation management positions, all but one (1) of these are already included in the current vegetation management operations and are necessary for the accomplishment of the vegetation programs. The Company is proposing a shift from contract to internal resources in this case.

As noted in the Company's response to OCC-333:

"The Vegetation Management positions allow the Company the opportunity to improve the system's reliability and improve cost-efficiency by transitioning more work in-house to restructure vegetation management performance for the benefit of our customers. While the twenty-one (21) Vegetation Management positions appear to be incremental, in reality there is only 1 incremental resource. Of the twenty-one (21), eight (8) of the FTEs are the result of 16 employees who currently split their time 50%/50% between O&M and capital work shifting to solely working on the proposed combined O&M program, if approved, results in the equivalent of 8 incremental employees working on the O&M program; twelve (12) resources would be converted from contracted resources to internal resources of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services; and one (1) resource would be truly incremental."

The five (5) power quality positions allow the Company to better serve our customers with dedicated resources that can troubleshoot, analyze, and identify power quality problems. Power Quality is typically a deviation from sinusoidal voltage or frequency and encompasses a wide variety effects, ranging from voltage sags and swells, surges, transients, low power factor, harmonics and other phenomena that disrupt service or damage customer and utility equipment. The causes of these issues can be failing equipment, lightning, equipment operation or installation as well as customer loads and DER, identifying the causes and mitigation requires specialized skills, field data and analytics. Currently within the Company there is no dedicated group responsible for resolving customer power quality issues This group will take ownership of these complaints and problems and troubleshoot customer power quality issues by taking actual field measurements at both the Company and customer premises. With field measurement and further engineering analysis, the power quality group will be able to identify the source of power quality concerns which could be at the utility side or at the customer side. Based on the group's assessment the Company will be able to improve response to customer power quality concerns and improve customer service.

The two (2) distribution planning and forecasting positions are designated resources for forecasting and modeling in distribution planning to comply with PURA's requirements outlined in the IDSP for advanced forecasting, 8760 forecasting, and larger number of scenarios, as well as to manage the stakeholder input, verification, and data sharing efforts associated with the IDSP docket. As stated by the Company in 21-05-15 RE03, compliance with an IDSP as

outlined by the Authority will require significant additional efforts. Not adding these incremental positions would severely hamper the Company's ability to:

- Meaningfully engage with the stakeholder process, review recommendations, data sets, and provide adequate responses and justifications to stakeholders
- Limit the ability to develop more than the currently staffed and resourced for single scenario peak load forecast
- Jeopardize the 8760 model delivery at circuit levels as envisioned by the Authority and Stakeholders

Supporting this effort would in turn provide the Company with these abilities, which would provide the Authority and stakeholders with more granular data as envisioned by the IDSP to better understand investment decisions.

[ii] OCC-566 Question:

In Exhibit CLP-TSP-1, Page 13, Eversource notes the following: "*The purpose of our joint testimony is to present CL&P's 5-Year Targeted System Performance Plan (the "TSP Plan" or the "Plan"), covering the planning horizon for operations and investment on the Company's distribution system over the timeframe of January 1, 2027, through December 31, 2031. A summary narrative of CL&P's State of the System report providing a foundational perspective on the 5-Year Plan is provided herewith as Exhibit CLP-TSP-2. In addition, a detailed presentation of the 5-Year TSP framework is presented as Exhibit CLP-TSP-3*."

The proposed decision issued on July 17, 2026, in docket 21-05-15RE03 lists the following content items for inclusion in an IDSP document:

a. Executive Summary - identifies key points from each section of the document;
b. Planning Policy – discusses relevant state and local goals and policies that inform grid planning;
c. Current State of the System – provides an overview of existing grid conditions including but not limited to capacity, reliability, and DER integration issues;
d. IDSP Methodology – explains the planning methods used to produce the IDSP;
e. Stakeholder Engagement and Social Equity – specifies how stakeholders participate in the IDSP process, as well as social and environmental equity considerations;
f. Load Forecasting – consists of all components of peak load;
g. Grid Needs Assessment – consists of various capacity, reliability, and resiliency analyses substantiating investment needs;
h. Solution Selection Process – provides the criteria and methods used to identify, assess, compare. and select both traditional and non-traditional grid capital investments for implementation;
i. Capital Investment Plan – lists, prioritizes, and describes all planned
j. investments for a ten-year planning horizon; and
k. Long-Term Strategic Plan – provides an overview of strategic plans for the grid beyond a ten-year planning horizon.

For each of the content items above, please share what aspects of the submitted TSP Plan represent information that would be included in each of the proposed IDSP sections.

Please include exhibit and slide or page numbers for any content that would belong in each of the content sections.

OCC-566 Response:

For the purpose of answering this question, the Company is assuming that the IDSP referenced in the question is as described in PURA's proposed final decision issued on July 17, 2026, in Docket No. 21-05-15RE03, and as proposed and discussed by the EDCs in Technical Meetings #10 to #12. As designed therein, the IDSP is intended to be a cohesive, strategic plan for ensuring safe, reliable and resilient electric service for all customers while supporting state clean energy and decarbonization goals. Given the scope of the proposed IDSP, with expanded requirements for analytics, stakeholder engagement and review, the EDCs expressed concerns about the timeline, process and specific elements in Written Comments and Technical Sessions. Consequently, the TSP Plan aligns generally with the IDSP content, particularly in terms of the state of the system and investment plans to address current and projected needs, while also reflecting practical differences.

More specifically, the TSP aligns with proposed IDSP sections, as follows:

a. Executive Summary - identifies key points from each section of the document;
   Please refer to:
   Exhibit CLP-TSP-1
   Exhibit CLP-TSP-3: Page 3-7

b. Planning Policy – discusses relevant state and local goals and policies that inform grid planning;
   Please refer to:
   Exhibit CLP-TSP-2: Page 20-21

c. Current State of the System – provides an overview of existing grid conditions including but not limited to capacity, reliability, and DER integration issues;
   Please refer to:
   Exhibit CLP-TSP-2
   Exhibit CLP-TSP-3: Page 13-38

d. IDSP Methodology – explains the planning methods used to produce the IDSP;
   Please refer to:
   Exhibit CLP-TSP-2: Page 9-20, 24-28
   Exhibit CLP-TSP-3: Page 33-34, 83-92, 96-120, 138-139, 141-149

e. Stakeholder Engagement and Social Equity – specifies how stakeholders participate in the IDSP process, as well as social and environmental equity considerations;
   Please refer to:
   Exhibit CLP-ELP-1: Page 19, 29

f. Load Forecasting – consists of all components of peak load;
   Please refer to:
   Exhibit CLP-TSP-2: Page 20-24
   Exhibit CLP-TSP-3: Page 18-20, 91-92, 138

g. Grid Needs Assessment – consists of various capacity, reliability, and resiliency analyses substantiating investment needs;
   Please refer to:
   Exhibit CLP-TSP-3: Page 51, 56-81, 93-95, 102-106, 114-120, 142-149

h. Solution Selection Process – provides the criteria and methods used to identify, assess, compare. and select both traditional and non-traditional grid capital investments for implementation;
Please refer to:
Exhibit CLP-TSP-3: Page 88-90

i. Capital Investment Plan – lists, prioritizes, and describes all planned investments for a ten-year planning horizon.
Please refer to:
Exhibit CLP-TSP-1: Page 40-72;
Exhibit CLP-TSP-2: Page 46-48;
Exhibit CLP-TSP-3: Page 7-12, 45-81, 102-105, 107-149

j. Long-Term Strategic Plan – provides an overview of strategic plans for the grid beyond a ten-year planning horizon.
Please refer to:
Exhibit CLP-TSP-2: Page 20-21