Date Filed: October 30, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:
(ENVIRONMENTAL REMEDIATION) See, e.g., Application, Ex. CLP-ENV-1, pp. 15, 20Provide the following information regarding the Company's compliance with Connecticut's Release-Based Cleanup Regulations (RCBRs), Conn. Agencies Regs. § 22a-134tt-1 et seq., and any other applicable standards, statutes, or regulations:

a. A narrative description of all data reporting requirements, required approvals, and required communications with the Department of Energy and Environmental Protection (DEEP) and the Department of Public Health set forth in the RCBRs;
b. Any Remediation Action Plans (RAPs) and reports submitted to DEEP for each of the 19 complex environmental remediation sites;
c. Documentation showing RAP approvals or other approvals from DEEP; and
d. Any progress updates provided to DEEP.

Response:

Please refer to the following narrative along with referenced supporting attachments in response to this request.

RS #5 Rockville MGP

a. This former MGP site is in DEEP's Voluntary Remediation Program (VRP) and Significant Environmental Hazard (SEH) Program. Annual Status Reports and SEH Status Update Forms were submitted to DEEP as required. The site has not yet been entered into the Release Based Cleanup Regulations (RBCRs) Site-Wide Program.

b. A RAP has not yet been completed for this site. Please refer to RSR-032, Attachment 1, and RSR-032, Attachment 2.

c. Not applicable. DEEP has not provided a response regarding the Screening Level Ecological Risk Assessment (SLERA) and Revised SLERA (RSLERA) which were submitted in March 2021 and May 2023, respectively.

d. VRP Annual Status Reports and Annual SEH Status Update Forms were submitted to DEEP as required. Please refer to RSR-032, Attachment 3, through RSR-032, Attachment 22.

RS #8 Torrington Former MGP

a. This site is not enrolled in a formal DEEP cleanup program. Therefore, there are no reporting requirements to DEEP or Department of Public Health (DPH). Investigation work conducted during the rate case time period was to evaluate the current environmental condition at the site.

b. This site is currently undergoing investigation. A RAP has not yet been developed. No reports have been submitted to DEEP for this site during this rate case period.

c. There is no RAP, or documents requiring approval for this site. No documents have been submitted to DEEP for this site.

d. No progress updates are required or have been submitted to DEEP for this site.

RS #9 Winsted Former MGP

a. This site is not enrolled in a formal DEEP cleanup program but does have an active Significant Environmental Hazard (now Significant Environmental Release under the RBCRs) notification. The SEH notification was submitted to DEEP in January 1999. Annual SEH update reports are required to be submitted to DEEP. No other data submittals, approvals, or communication to DEEP or DPH are required.

b. This site is currently undergoing investigation. A RAP has not yet been developed. Aside from annual SEH status update reports, no other reports have been submitted to DEEP for this site during this rate case period.

c. No RAP has been developed for this site. DEEP does not provide approvals for the SEH updates submitted to them.

d. Annual SEH Status Updates have been submitted to DEEP for this site. Status Updates for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 23, through Attachment 29. No other progress updates have been provided to DEEP.

RS #23 Ridgefield Rail Trail

a. The site is a former railroad bed that is currently a transmission right-of-way (ROW) and improved by a rail-to-trail recreational space. In December 1998, due to the discovery of elevated concentrations of arsenic from suspected railroad pesticide application in surface soils, a SEH Notification was submitted to DEEP.

In 2000, a liner system was installed across the entire former railroad bed between Prospect Street and Florida Road. The liner system consists of stone screenings and processed aggregate placed over a geocomposite, geomembrane, and geotextile, serving as a protective cap. These measures effectively mitigated the identified SEH condition.

A Maintenance and Observation Plan is followed which is designed to reduce the risk of liner exposure by identifying and addressing potential problems before they materialize. Semi-annual inspections have been conducted in April and October to visually assess drainage systems, trail surface erosion, slope stability, sediment accumulation within swales, and vegetative growth. Based on inspection findings, maintenance and repair activities have been performed as necessary.

Annual SEH Status Update Forms have been submitted to DEEP as required.

b. A RAP was submitted to DEEP in June 2000. Please refer to RSR-032, Attachment 30, through RSR-032, Attachment 32.

c. The Company did not receive correspondence from DEEP indicating RAP approval. DEEP does not normally provide approvals of RAPs.

d. Annual SEH Status Update Forms were submitted to DEEP as required. Please refer to RSR-032, Attachment 33, through RSR-032, Attachment 39.

RS #27 Portland, CT ROW#2

a. This Site is not currently in a regulatory program, thus there are no reporting requirements, required approvals, and no formal regulatory communications with DEEP. This site is partially a Transmission line right of way and partially leased to a gravel mining operation. The Site is fully characterized, and various remedial options have been presented.

b. A decision on the remedial path has not been selected, and no RAPs or other reports or updates have been submitted to DEEP.

c. A decision on the remedial path has not been selected, and no RAPs or other reports or updates have been submitted to DEEP.

d. A decision on the remedial path has not been selected, and no RAPs or other reports or updates have been submitted to DEEP.

RS #52 Williams Street Substation

a. PCB impacts were discovered during a soil characterization exercise to support a construction project within the substation. The PCBs were remediated under a Performance Based Cleanup program dictated by EPA which does not require a RAP submittal or any progress reports. At the conclusion of the remediation in April 2019, DEEP requested groundwater compliance monitoring to be conducted. DEEP emailed Eversource on January 17, 2020, saying they reviewed the Summary of Remedial Actions for PCB Impacted Soil at Williams St 9L Substation and DEEP had no further comments or questions. Groundwater was monitored from 2019 to 2023. In February 2024, a Compliance Monitoring Closure Report for PCB Remedial Actions was submitted to DEEP for review. DEEP emailed back on May 6, 2024, that the Corrective Action Unit reviewed the document, and they stated they are not requesting any further remedial actions.

b. No Remedial Action Plan was required nor generated.

c. No RAP approvals obtained. DEEP did not offer any approvals other than no further comments via email on the Summary of Remedial Actions, and Compliance Monitoring Closure Report. Please refer to RSR-032, Attachment 40, and RSR-032, Attachment 41.

d. No progress reports were required.

RS #55 Hunts Brook Fly Ash Site

a. This site is not enrolled in a formal DEEP cleanup program but does have an active Significant Environmental Hazard (now Significant Environmental Release under the RBCRs) notification. The SEH notification was submitted to DEEP in May 2007 for an SEH condition in groundwater and in May 2020 for an SEH condition in soil. Annual SEH update reports are required to be submitted to DEEP. No other data submittals, approvals, or communication to DEEP or DPH are required.

b. This site is currently undergoing investigation. A RAP has not yet been developed. Aside from annual SEH status update reports, a Site investigation Report was submitted to DEEP in October 2021. No other reports have been submitted to DEEP for this site during this rate case period.

c. No RAP has been developed for this site. DEEP does not provide approvals for the SEH updates or Site Investigation Reports submitted to them.

d. Annual SEH Status Updates have been submitted to DEEP for this site. Status Updates for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 42, through RSR-032, Attachment 48. No other progress updates have been provided to DEEP.

RS #56 Historic Transformers (Capewell)

a. This site was placed into the reserves around 2004 when a pad mounted PCB transformer was vandalized and oil leaked into soil beneath the transformer and adjacent to the building. Multiple remediation events were completed between 2004 and 2009. Eversource conducted the emergency response cleanup and investigation and later the property owner conducted additional remediation as part of the property redevelopment. Eversource and the property owner agreed to a settlement agreement and the final payment under a settlement agreement was made in December 2020, when the property owner was able to complete an Environmental Land Use Restriction on the property. Then the property owner issued a General Release for further claims in early 2021, so the site was removed from the Reserves.

b. Eversource was not required to submit a RAP.

c. No RAP approvals were obtained.

d. No progress reports were generated or submitted to DEEP.

RS #58 Former Enfield AWC

a. This site is currently enrolled in the Property Transfer Program. CL&P is the Certifying Party on a Form III submittal in January 1998. Currently, CL&P plans to complete LEP verification of the site under the requirements of the Property Transfer Act. This includes the submission of annual status update reports, completion of investigation report, remediation action plan(s), and a final LEP verification report to DEEP. Previously submitted reports are discussed further in responses to additional questions/requests.

b. The original RAP for the remediation related to the UST release is not readily available electronically. A paper copy may be available in offsite storage. A RAP addendum was submitted to DEEP concurrently with the 2012 Annual Status Report. The addendum was to address remediation required in the area of the buried utility system debris.

c. A RAP and RAP addendum have been submitted to DEEP, however; DEEP does not typically provide approvals for RAPs. Therefore, documentation showing approval of the RAP or RAP addendum by DEEP is not available.

d. Annual Status Reports have been submitted to DEEP for this site. Status reports for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 49, through RSR-032, Attachment 54. No other progress updates have been provided to DEEP.

RS #63 Berlin Settling Basin

a. PCB-impacted sediment/soil was identified during basin maintenance in 2011, prompting investigation of the basin, uplands, and adjacent unnamed stream until 2018. A DEEP Consent Order was finalized in December 2018. The Consent Order had numerous conditions including submittal of quarterly progress reports until all conditions of the Consent Order are satisfied. A Notification of Significant Environmental Hazard (NSEH) was reported on October 1, 2012. Annual SEH status reports were sent to DEEP. The last Annual SEH status report was submitted in March 2022, after the remediation was complete. A PCB Cleanup and Risk Based Disposal Approval Request was submitted to EPA on January 25, 2019. EPA Approved the Cleanup Plan on June 27, 2019. DEEP approved the Cleanup Plan on August 7, 2019. Eversource requested a modification to the approval and EPA approved the modification on April 7, 2020. A second request for modification of the approved RAP was submitted on December 10 2020, and approved by EPA on December 18, 2020. A Post Remediation Groundwater Monitoring Plan was submitted to DEEP on July 9, 2021. DEEP approved the Groundwater Monitoring Plan on July 27, 2021. A Federal Use Restriction was recorded on the Town of Berlin Land Records on December 8, 2021. The Environmental Land Use Restriction was recorded on December 18, 2025.

b. A RAP titled a PCB Cleanup and Risk Based Disposal Approval Request was submitted to EPA and DEEP on January 25, 2019. An earlier draft RAP for a hybrid Self Implementing Plan and Risked Based Cleanup Plan was created and circulated to DEEP but later withdrawn and replaced with the RAP submitted in 2019. Please refer to RSR-032, Attachment 55, for a copy of the RAP Report.

c. EPA approved the RAP received on June 27, 2019 and DEEP approved the RAP on August 7, 2019 and both are included. Both approvals of the two modifications to the RAP approval are also included. The approval of the groundwater monitoring plan by DEEP is also included. Please refer to RSR-032, Attachment 56, through RSR-032, Attachment 60, for the approvals.

d. Twentynine progress reports required by the Consent Order and the SEH annual reports are included in RSR-032, Attachment 61, through RSR-032, Attachment 98. However, the 2013 SEH annual progress report is not available and likely not created because there was a meeting with DEEP, EPA, and Eversource in 2013.

RS #64 Property Transfer Wethersfield

a. The site (176 Cumberland Avenue, Wethersfield) was previously owned and then leased back to CL&P in the 1950′s. In 1998, Wethersfield LLC purchased the property and CL&P continued to be a tenant until 2006. In 2012, Wethersfield LLC sold the property and filed a

Form III and Environmental Condition Assessment Form (ECAF), per the Transfer Act. CL&P was not the certifying party or responsible for verification but was responsible for remedial excavation of a limited impacted soil area and post-remediation groundwater monitoring. Annual status reports were subsequently submitted and the annual reports for 2017 through completion in 2022 are provided as RSR-032, Attachment 99, through RSR-032, Attachment 109.

b. The RAP was submitted on August 27, 2013, for the excavation work which was completed in Q3 2013. Please refer to RSR-032, Attachment 110.

c. No approvals have been received or are expected, as CL&P is not the Property Owner or Certifying Party for this site.

d. Annual progress updates were submitted from 2017 to 2022. The 2021 Completion of Investigation COI was submitted and the on-site wells were decommissioned. Please refer to RSR-032, Attachment 111.

RS #66 East Hampton

a. On November 4, 2019, CL&P submitted a Request for Closure of a Significant Environmental Hazard for a 2012 hydraulic lift release. The Request for Closure Report includes the initial SEH Notification submitted in April 2012, DEEP's Acknowledgement of the SEH Notification, the 60-day report required by the Acknowledgement and the subsequently requested year of quarterly sampling results submitted to DEEP in April 2014. In addition, the SEH Request for Closure also included another round of residential well sampling results requested by DEEP in 2018. The sample results were all well below the applicable groundwater protection criteria. On February 24, 2026, CL&P resubmitted the 2019 SEH closure request due to delayed engagement by the DEEP and in anticipation of the new RBCRs taking effect (See RSR-032 Attachment 115 and RSR-032 Attachment 116). On April 16, 2026, CL&P received a Certification of Compliance for the 2012 SEH, the submittals and approvals for the SEH were also sent to the Director of Health at the Chatham Health District. Reports referenced above represent the progress updates submitted to DEEP during this period. Please refer to RSR-032, Attachment 112, through RSR-032, Attachment 114.

b. – d. RAPs have been prepared for this site. Other reports and approvals are identified above.

RS #67 Madison AWC (closed December 2025-adjustments January 2026)

a. Groundwater & Environmental Services Inc. (GES) developed a RAP and site-specific plans and specifications for a competitive bid for the remedial contractor to implement an excavation approach. Please refer to RSR-032, Attachment 117.

b. The RAP was submitted to DEEP on September 30, 2022. Please refer to RSR-032 Attachment 117.

c. A RAP approval is typically not issued by DEEP. The remedial contractor bid was awarded to True Blue on April 18, 2023. Remedial activities were completed between June and September 2023.

d. A Remedial Action Report (RAR) was submitted to DEEP on December 7, 2023 (Please refer to RSR-032 Attachment 118). A post remedial groundwater monitoring program, consisting of quarterly groundwater sampling events, was completed between January and October 2024. A LUST closure report was submitted to the DEEP on March 14, 2025 (See RSR-032, Attachment 119).

   GES provided an LEP Opinion Letter on October 27, 2025 (RSR-032 Attachment 120), indicating that the former USTs were closed properly, and that soil and groundwater associated with the historical gasoline release(s) had been investigated and remediated in compliance with the Connecticut UST regulations and the remediation regulations in effect at the time work was completed. The Site was closed and removed from the reserve in December 2025/January 2026. See also, RSR-032, Attachment 121, for a well decommissioning letter.

RS #68 Former Simsbury AWC

a. This site is currently enrolled in the Property Transfer Program. CL&P is the Certifying Party on a Form III submittal in January 2002. Currently, CL&P plans to complete LEP verification of the site under the requirements of the Property Transfer Act. This includes the submission of annual status update reports, completion of investigation report, remediation action plan(s), and a final LEP verification report to DEEP. Previously submitted reports are discussed further in responses to additional questions/requests.

b. This site is currently undergoing investigation. A RAP has not yet been developed. Several quarterly and annual update reports as well as a Final Site investigation Report for a portion of the site have been submitted to DEEP during this rate case period.

c. No RAP has been submitted to DEEP. Other documents that have been submitted to DEEP for this site have not received approvals. DEEP does not normally provide formal approvals of RAPs or update reports.

d. Annual Status Reports have been submitted to DEEP as required in the Property Transfer Act Schedule. A copy of the status reports for the applicable rate case time period (2017-2025) are included in RSR-032, Attachment 122, through RSR-032, Attachment 160.

RS #103 Parsons Lane Durham

a. This site is in DEEP's Spills Program. The Final Remedial Action Report was submitted to DEEP in 2025 and this spill case was closed in 2026. This case is not subject to the RBCRs. A summary of key milestones during the rate case time period is provided below:

- October 19, 2018 – A spill involving mineral oil dielectric fluid (MODF) containing polychlorinated biphenyls (PCBs) >50 parts per million (ppm) was reported to DEEP, and Case No. CWC-18-05541 was assigned.
- May 7, 2019 – The Interim Remedial Action Report (IRAR) was submitted to DEEP and EPA.
  - This report summarized emergency response actions, follow-up investigations, and interim remediation activities conducted between October 2018 and April 2019.
  - It also recommended additional investigation, ecological risk assessment, and potential remedial actions based on the findings.
- November 21, 2019 – The Ecological Risk Assessment Work Plan was submitted to DEEP and EPA.
  - The work plan was developed with DEEP concurrence.
  - At that time, EPA indicated that review would be deferred and that we should proceed in accordance with DEEP's recommendations.
- December 15, 2021 – The Screening-Level Ecological Risk Assessment (SLERA) Letter Report was submitted to DEEP and EPA.
  - This report summarized sediment analytical results from 2018 and 2021, compared them to applicable risk criteria, and identified areas requiring remediation.
- March 15, 2024 – The RAP was submitted to DEEP.
  - The RAP outlined the approach for addressing five PCB-impacted stream areas identified in the SLERA and incorporated DEEP's recommendations.
  - The sediment remediation work was completed in October and November 2024.
- February 28, 2025 – The Final Remedial Action Report (FRAR) was submitted to DEEP and EPA.

- This report summarized investigation and remedial activities conducted between 2020 and 2024 and referenced the interim response actions documented in the IRAR.
- It concluded that the cumulative response actions completed between 2018 and 2024 are sufficient and that no further investigation or remediation is warranted.

- This spill case has been closed.

b. A RAP was submitted to DEEP in March 2024. Several other reports were submitted during this rate case time period (See copies of these reports in RSR-032, Attachment 161, through RSR-032, Attachment 165).

c. DEEP did not provide formal RAP approval. DEEP approval is not required as this remediation was led by a LEP. However, DEEP was involved with the direction of the SLERA which guided identification of the sediment remediation that was completed. DEEP ultimately responded with no further comments on the FRAR.

d. No other progress update reports were submitted to DEEP. DEEP was updated on project status verbally by Eversource during monthly PCB meetings.

RS #117 Berlin Campus

This reserve site is comprised of two separate releases at the Berlin Campus that were reported to DEEP: 1) a gasoline LUST that impacted soil and groundwater and 2) a ceiling air handling unit water release which caused sheens to appear on concrete within an oil tank containment area.

- UST Tank J11 LUST:
  - In 1997, a release was reported to DEP, when approximately two gallons of gasoline was discovered pooled within the top of UST Tank J11 located adjacent to the Central Maintenance Service (CMS) Building which had previously been abandoned in place by pouring concrete inside the tank. The tank and surrounding soil was removed. A subsurface investigation (via drilling) was performed to delineate soil and groundwater impacts. Based on the findings, NUSCO informed DEEP that a soil vapor extraction system was being installed, and it operated for 20 years. The system was shut down in 2024.

  - Between 2024 and 2025, a follow-up soil and groundwater investigation was performed to confirm the nature and extent of the release area. In July 2025, a release investigation report was submitted to DEEP which concluded prior remediation and natural attenuation processes have reduced contaminant concentrations in soil to below RSR criteria. Groundwater monitoring data

demonstrates concentrations of dissolved phase constituents are decreasing, and the plume is in a diminishing state. A post-remedial groundwater monitoring program consisting of quarterly groundwater sampling to evaluate monitored natural attenuation as a remedial solution was recommended. This program began in Q4 2025, and the quarterly report was submitted to DEEP in February 2026.

- CMS Building Tank Room C Containment PCB Release:

  - In July 2021, following a release of water from a ceiling air handling unit to the tank containment area in the CMS Building Tank Room C, sampling was performed which identified the presence of PCB >50 ppm within the concrete containment area from historic operations. The condition was reported to the DEEP Spills Division.
  - In December 2024, the concrete surface within the tank containment area was encapsulated by applying two coats of contrasting colored epoxy paint. In March 2025, the Tank Room C PCB Encapsulation Completion Report was submitted to DEEP and EPA, and informed that an Annual Inspection, Maintenance, and Monitoring Plan (IMMP) would be implemented.

b. RAPs have not been submitted to DEEP for either of these releases.

e. EPA and DEEP email correspondence in response to the Tank Room C PCB Encapsulation Completion Report is provided in RSR-032, Attachment 166.

f. Post-remediation quarterly groundwater monitoring updates are submitted to DEEP (See RSR-032, Attachment 167, and RSR-032, Attachment 168). DEEP was updated on project status verbally by Eversource during monthly PCB meetings.

RS #118 2 Main Street Enfield CT

a. This site was historically occupied by an approximately 9,000 square foot former electric power generation facility from approximately 1953 until 1982. The site is currently vacant. A hazardous building materials assessment confirmed there are building materials that require remediation. Previous subsurface investigations indicate the need for remediation as well. This Site is not currently in a regulatory program, thus there are no reporting requirements, required approvals, and no formal regulatory communications with DEEP.

b, c, d. No RAPs or other reports or updates have been submitted to DEEP.

The site is under a purchase & sale (P&S) agreement with four other adjacent and nearby parcels (P&S agreement executed on 11/3/2025).

RS #119 Windsor Operations Center

a. Historically the Site was used for agricultural land (tobacco cultivation) and residential since at least 1934. The Site was redeveloped with the current building and improvements between 2000 and 2001. JDS Uniphase (JDS), a fiber optic component manufacturer, occupied the Site from 2001 to 2004. JDS was an SQG. After JDS, CL&P utilized the building onsite to use as a call center. This site is currently enrolled in the Property Transfer Program. An ECAF and Form III were submitted in December 2021. CL&P is the Certifying Party on a Form III. The ECAF is included in Attachment 169. Phase I through III site investigations on site indicated multiple areas impacted at concentrations above the applicable standards. We are in the process of excavating PCB impacted soil on site. Currently, CL&P plans to complete LEP verification of the site under the requirements of the Property Transfer Act. This includes the submission of annual status update reports, completion of investigation report, remediation action plan(s), and a final LEP verification report to DEEP. Previously submitted reports are discussed further in responses to additional questions/requests.

b. A copy of the Form III (RSR-032, Attachment 170), Final Site Investigation Report (RSR-032, Attachment 175), and RAP (RSR-032, Attachment 176) are included. One annual status report has also been submitted (RSR-032, Attachment 177). No other reports have been submitted to DEEP for this site during this rate case period. One letter that was submitted to DEEP requesting approval for the reuse of topsoil has been included as RSR-032, Attachment 178.

c. A RAP was submitted to DEEP, however; DEEP does not typically provide approvals for RAPs. Therefore, documentation showing approval of the RAP by DEEP is not available. (See RSR-032, Attachment 176).

e. One Annual Status Update (2025) has been submitted to DEEP as required in the Property Transfer Act Schedule. A copy of the status update has been included in RSR-032, Attachment 177.

RS #121 Bartholomew 18

a, b, c, d. There are currently no data reporting requirements, required approvals, or communications with the DEEP or DPH as set forth in the RBCRs required for Bartholomew 18 as the reserve was recently established. Phase I Environmental Site Assessment activities are in progress and there has been no discovery of releases at the site to date and the site is not currently in a regulatory program.

Date Filed: October 16, 2026

Witness: Craig Dikeman, Marc J. Richards, Gary A. Iadarola, and Matthew J. Correia
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Provide the following regarding the procurement of vendors to perform remediation work on the remediation sites since 2017:

a. The processes the Company followed to ensure costs reflect competitive market rates;
b. Copies of all RFPs the Company issued for and the number of respondents for each RFP;
c. All bids received for each solicitation; and
d. A description of how the Company promoted the RFP and ensured a competitive solicitation process.

Response:

For the purposes of this response, the Company has interpreted "environmental remediation" to mean physical remediation work performed at the remediation sites.

a. The Company generally requires procurements exceeding $50,000 to be competitively bid unless supported by an approved sole-source justification or other documented exception. Procurement may also competitively bid work below that threshold when financially prudent, considering the anticipated benefits of competition and the time and cost of conducting the sourcing event.

   Proposals are evaluated using applicable commercial and technical criteria to identify the best evaluated bid and assess whether proposed costs are reasonable and reflective of market conditions at the time of award.

b. Please refer to RSR-033, Attachment 1, for a listing of environmental remediation events, including the 2019-2024 remediation framework, the 2025-2028 remediation framework, and all project specific RFP events. RSR-033, Attachment 1, also identifies the number of suppliers that responded to each RFP.

   Please refer to RSR-033, Attachment 2 CONFIDENTIAL, for copies of all environmental remediation RFPs listed in RSR-033, Attachment 1.

c. Please refer to RSR-033, Attachment 3, for a listing of the evaluations for these events. RSR-033, Attachment 4 CONFIDENTIAL, includes the evaluation scorecards for these

events. Due to the volume and commercially sensitive nature of the underlying proposals, the Company will make specific proposals available for confidential review upon request.

d. The Company promoted and conducted the RFPs through its established sourcing processes utilizing SAP Ariba. In collaboration with its internal business partners, the Company developed the scope of work, identified qualified suppliers capable of providing the required services, and established the applicable commercial, technical, safety, and business requirements.

   The RFPs were distributed to qualified suppliers through SAP Ariba, which provided a consistent platform for distributing solicitation materials, communicating with participating suppliers, and receiving proposals. Suppliers were identified based on their qualifications, relevant experience, capabilities, and ability to perform the required remediation work.

Date Filed: October 13, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Has DEEP imposed civil or criminal penalties on the Company or issued any orders to the Company to prevent or abate pollution at any time since January 1, 2017? If yes, provide complete details of each penalty and order.

Response:

Please refer to the listing below for the requested information;

- **RS#5 Rockville MGP**
  No Civil, Criminal penalties or Orders issued at this site since January 1, 2017.
- **RS #8 Torrington Former MGP**
  No Civil, Criminal penalties or Orders issued at this site since January 1, 2017.
- **RS #9 Winsted Former MGP**
  No Civil, Criminal penalties or Orders issued at this site since January 1, 2017.
- **RS#23 Ridgefield**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS#27 Portland, CT ROW#2**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS# 52 Williams 9L**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS #55 Hunts Brook Fly Ash Site**
  No Civil, Criminal penalties or Orders issued at this site since January 1, 2017.
- **RS#56 Historic Transformers (Capewell)**
  No Civil, Criminal penalties or Orders issued at this site since January 1, 2017.
- **RS #58 Former Enfield AWC**
  No Civil, Criminal penalties or Orders issued at this site since January 1, 2017.
- **RS#63 Berlin Settling Basin**
  The December 26, 2018, Consent Order required a total payment of a penalty of $70,000, of which $25,000 was a penalty, and $45,000 was an expenditure for a Supplemental

Environmental Project. The Supplemental Environmental Project was the Town of Wallingford's Hall Ave Pedestrian Improvements and Senior Center Trail.

- **RS #64 Property Transfer Wethersfield**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS #66 East Hampton**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS#67 Madison AWC (closed December 2025-adjustments January 2026)**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS #68 Former Simsbury AWC**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS#103 Parson Lane Durham**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS#118 2 Main Street Enfield CT**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS#117 Berlin Campus**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS #119 Windsor Operations Center**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.
- **RS #121 Bartholomew 18**
  No civil, criminal penalties or orders have been issued at this site since January 1, 2017.

Date Filed: October 13, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 28–29. Regarding Site #58 Enfield Area Work Center (AWC):

a. Confirm that remediation needs at this site are driven by the release of gasoline and diesel from underground storage tanks and by contamination from buried utility system debris. List any other factors driving remediation needs at this site;
b. Explain the origin of the buried utility system debris and describe whether CL&P has historically disposed of utility system equipment by burying it.

Response:

a. Contamination as a result of the release from gasoline and diesel USTs was addressed through a groundwater treatment system that operated from 1990 to 2003. Releases from the USTs were remediated prior to this rate case period. Contamination identified in the vicinity of the former septic tanks and leaching field was remediated in 2009. The remaining remediation needs (and costs accrued within this rate case period) are related to the contamination from buried utility system debris.

b. CL&P began operations at the Former Enfield Area Work Center in 1944 and ceased activities in 1995. No documentation of the origin or time of placement of the buried utility system debris has been identified. To our knowledge, CL&P did/does not have a documented history of or policy pertaining to the disposal of utility system equipment via direct burial.

Date Filed: October 13, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 21–23.
Regarding Site #5 Rockville Former Manufactured Gas Plant, the Company states that several distribution, transmission and gas related construction projects were completed at this site. Explain whether any of the remediation costs have been allocated to Eversource's gas, transmission, or other operating subsidiaries.

Response:

Planned distribution, transmission, and gas related construction projects were completed at this site with capital funding associated with the specific operating subsidiary. Soil, concrete, and building materials that are planned for removal as part of the construction design are typically characterized for proper on-site or off-site waste management purposes in advance of the work. When polluted, contaminated, or hazardous materials are encountered as part of the planned construction activities (additions or removals), the costs associated with proper on-site handling or abatement and off-site waste disposal are allocated to the established construction project work orders, accordingly. Planned environmental work performed in support of advancing the MGP site toward regulatory closure, whether it be characterization/investigation or remediation, is allocated to the established "reserve".

Date Filed: October 14, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 34–35. Regarding Site #103 Parsons Lane Durham Mineral Oil Dielectric Fluid Release:

a. Provide a copy of the settlement agreement;
b. Provide the total portion of project costs recovered through the settlement agreement and the portion of costs requested for recovery in this proceeding;
c. Explain why these costs are recovered through the deferred accounting mechanism rather than as a routine environmental remediation cost; and
d. Describe why the utility pole failed and provide the age of the pole at the time of failure.

Response:

a. Please refer to RSR-037, Attachment 1 CONFIDENTIAL, for a copy of the settlement agreement.

b. Please refer to RSR-037, Attachment 2 CONFIDENTIAL, for the requested information.

c. As noted in the testimony in Exhibit CLP-ENV-1 of Marc J. Richards, Gary A. Iadarola, and Clare B. Connolly, the sequence, timing, and magnitude of response activities can vary from site to site depending upon the size of the site, the degree of contamination, nearby sensitive receptors, land ownership, the degree of oversight and control exercised by regulators, and many other site-specific factors. These dynamic circumstances, on-site conditions and state and municipal requirements or expectations speed projects up or slow projects down, impacting not only timing but cost. All of these variables make it extremely difficult to accurately forecast the level of expense to be incurred in a year and cause significant fluctuations year-over-year in the level of expense incurred. Therefore, these costs do not fit well with traditional base rate recovery which is designed to establish base distribution rates based on expected future levels of annual costs. The variability in these environmental remediation costs drives the need for the continuation of deferral treatment. This request is not a blank check, but rather a treatment that requires the Company to meet the burden of a prudence review on its environmental remediation costs in the next rate case.

d. The pole was installed in 1962. The reason for failure is unknown.

Date Filed: October 20, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:
(ENVIRONMENTAL REMEDIATION) Provide the following information regarding remediation associated with leaking or compromised underground storage tanks (USTs):

a. A narrative description of the requirements of Conn. Agencies Regs. § 22a-449(d)-1 et. seq.;
b. Records of installation, maintenance, inspection, and repair for each UST or associated component suspected of causing remediation costs;
c. The cost for each site resulting from the need to remediate pollution from the USTs;
d. A description of why the USTs failed, leaked or were otherwise compromised;
e. A description of how the Company routinely assesses the integrity of its USTs;
f. Whether the Company's insurance policies cover any amount of the costs resulting from compromised UST and the amount of insurance proceeds; and
g. Whether the Company has at any time been in violation of Conn. Agencies Regs. § 22a-449(d)-1 et. seq.

Response:

a. The Connecticut underground storage tank (UST) regulations have been in effect since 1985 and have had significant updates at least every 10 years, with the most recent updates being in 2025. The requirements include and go beyond those required at the federal level. The following is a summary of the current regulations under RCSA §22a-44(d)-1. RCSA § 22a-449(d)-1 et seq. establishes requirements for the registration, installation, operation, maintenance, release detection, closure, and corrective action associated with underground storage tank systems containing petroleum and certain other regulated substances. The regulations establish standards intended to prevent releases from underground storage tank systems and require owners and operators to maintain applicable tank and piping systems, conduct required release detection and inspections, report suspected or confirmed releases to the Connecticut Department of Energy and Environmental Protection (CT DEEP) and undertake investigation and corrective action when releases occur. The regulations also establish requirements for tank closure, recordkeeping, and financial responsibility, as applicable.

b.

Site	Response
RS#8 Torrington Former MGP	Available electronic records for the 4,000-gallon diesel UST and 10,000-gallon gasoline UST, both removed in 1988, are included in RSR-038, Attachment 1. Additional paper records may be available at off-site storage but are not accessible given the requested deadline.
RS#66 East Hampton	Several USTs were abandoned in place and removed from the site from 1984 to 2008 (see RSR-038, Attachment 2). However, the remediation costs during the rate case period (2017 through 2025) are only associated with a release from the former 10,000-gallon unleaded gasoline UST installed in 1980. The 10,000-gallon unleaded gasoline UST installed in 1980 was tightness tested in 1984 (see RSR-038, Attachment 3); it was determined to have a fuel supply line leak and was taken out of service. Follow up groundwater testing identified gasoline and gasoline constituents in the groundwater and Consent Orders were issued by DEEP. In response to this, the gasoline UST in this area and the associated fuel pumps and petroleum impacted soils were removed to the extent feasible due to the presence of the Garage Building foundation. In addition, new water supply wells, interceptor wells and a pump/treat groundwater treatment system were installed and continually operated for over 30 years.
RS#67 Madison AWC (closed December 2025-adjustments January 2026)	The Site is comprised of an active electrical operations Area Work Center (AWC). In the late 1980's, petroleum impacts associated with USTs and a fueling island were identified. In response to this, the USTs, fuel pumps and petroleum impacted soils were removed, and an active pump/treat groundwater treatment system was installed as part of the remediation of this area of the Site. The treatment system was continuously operated for approximately 30 years; however, hydrocarbon impacts remained in the subsurface. In May 2020, Eversource requested our consultant (GES) provide an opinion on the remedial options for the Site. GES recommended a phased excavation approach to remove source soil to achieve regulatory compliance at the Site. See provided historical reports included in RSR-038, Attachment 4.
RS#117 Berlin Campus	One former 2,000-gallon gasoline UST, Tank J11, has associated remediation costs during this rate period. Historical records of previous installation, maintenance, inspection, and repair of Tank J11 may be available and stored off premises but are not readily available

	electronically. We are not able to get these files within the due date specified. In September 2023, an environmental reserve was established to evaluate and address remaining contamination associated with a gasoline release from the Tank J11 UST located adjacent to the Berlin Campus Central Maintenance Service Building. Tank J11 was abandoned in place sometime before 1980. The tank and immediately surrounding soils were removed from the ground in 1997 when approximately 2 gallons of gasoline was discovered pooled within the top of the tank during construction activities to improve the parking lot. NUSCO later advanced several test borings and installed monitoring wells to define the extent of gasoline-impacted soil and groundwater. Based on characterization findings and limited gasoline recovery efforts, NUSCO installed a soil vapor extraction and air sparge system to address the plume which operated between 2004 and 2024

c.

Site	**Response**
RS#8 Torrington Former MGP	Site-wide environmental investigation was conducted during the rate case period. Estimated environmental investigation costs directly related to the 4,000-gallon diesel UST and/or 10,000-gallon gasoline UST during this rate case period (2017 through 2025) are approximately $11,000. Remediation of areas impacted by these USTs did not occur during the rate case period.
RS#66 East Hampton	While full accounting records are not available an internal Memo from 1985 indicates that over a million dollars was estimated to be spent in the remainder of 1985 ($900,000 to expense and $250,000 for capital) to install the infrastructure needed to address the gasoline leak and that $30,000 per year was estimated for future operation, maintenance and monitoring of the groundwater treatment system. The Reserve for the site was not established until Q4 2012 and was set at $110,000 for a three-year period. Spend during the Rate Case period for on-going treatment system operation, maintenance, monitoring and additional groundwater and soil investigation following treatment system shut down in 2021 to determine current site conditions totaled $384,751.05.

RS#67 Madison AWC (closed December 2025-adjustments January 2026)	The cost to remediate pollution from the USTs during this rate case period is $2,721,763.97.
RS#117 Berlin Campus	In Q3 2023, an environmental consultant provided a remedial cost to closure estimate which became the basis for the reserve funding. The estimate included the following remaining remedial tasks and costs associated with the J11 release: o Initial Review, Evaluation, Findings and Opinion Report, Cost to Closure Estimate = $20,246.75 o Site Characterization = $197,767 o Remediation = $49,410 o Remedial Action Plan and Monitored Natural Attenuation Post-Remediation Field Activities = $48,600 The cost to remediate pollution from the USTs during this rate case period is $280,638.58.

d.

Site	**Response**
RS#8 Torrington Former MGP	Upon removal, the 4,000-gallon diesel UST was observed to be severely corroded with dime sized holes. The 10,000-gallon leaded gasoline UST was observed to be corroded and pitted but no obvious holes were identified at the time of removal. UST removal documentation indicates that gasoline impacts were observed during the removal of the 4,000-gallon diesel UST in March 1988. As a result, the adjacent 10,000-gallon gasoline UST was removed in April 1988.
RS#66 East Hampton	The 10,000-gallon fiberglass reinforced plastic tank, that was installed in 1980 and tightness tested in 1984, was determined to have a fuel supply line leak at a coupling on top of the tank, which was opined to be an installation error, and the tank was taken out of service. There are no USTs currently located at this site; the last tank was removed from the site in 2008.
RS#67 Madison AWC (closed December 2025-	The age of the UST system was the suspected reason for failure.

adjustments January 2026)	
RS#117 Berlin Campus	The tank was not observed to be in poor condition when it was removed. The cause of the leak/release is unknown.

e. The Company has assessed the integrity of previous USTs in accordance with RCSA § 22a-449(d)-1 et seq. It should be noted that the Company has no known USTs that remain in service and all known USTs have been removed/permanently closed.

f. The insurers exclude underground infrastructure under the Companies current insurance policies therefore the Company is unable to recovery insurance proceeds.

g.

Site	**Response**
RS#8 Torrington Former MGP	No violations are known relating to these USTs.
RS#66 East Hampton	No violations are known relating to these USTs.
RS#67 Madison AWC (closed December 2025-adjustments January 2026)	No violations are known relating to these USTs.
RS#117 Berlin Campus	No violations are known relating to this UST.

RS#5 Rockville MGP

Not applicable. There are no known USTs on-site. Two former below ground gas holders with tar impacted material remain and will be remediated as part of a site-wide remedial action plan. These holders appear to be intact.

RS #9 Winsted Former MGP

Not applicable. Two gasoline USTs were removed from the site in 1986. It is noted that signs of release were not observed at the time of removal. No remediation costs are associated with a release from USTs at the site.

RS#23 Ridgefield Rail Trail

Not applicable. This site is a former railroad bed. There has been no remediation associated with leaking or compromised USTs at this Site.

RS#27 Portland, CT ROW#2

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS#52 Williams St 9L

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS#55 Hunts Brook Fly Ash Site

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS#56 Historic Transformers (Capewell)

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS #58 Former Enfield AWC

Not applicable. One gasoline and one diesel UST were removed from the site in 1993. It is noted that no evidence of a release was observed at the time of removal. No remediation costs associated with the release from these USTs were accrued during this rate case period.

RS#63 Berlin Settling Basin

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS#64 Property Transfer Wethersfield

Not applicable. There has been no remediation associated with leaking or compromised USTs at this site.

RS #68 Former Simsbury AWC

Not applicable. Several USTs were removed from the site or abandoned in place from 1979 to 2001. No remediation costs during the rate case period (2017 through 2025) are associated with a release from USTs at this site.

RS#103 Parsons Lane Durham

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS#118 2 Main Street Enfield CT

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS #119 Windsor Operations Center

Not applicable. There has been no remediation associated with leaking or compromised USTs at this Site.

RS #121 Bartholomew 18

Not applicable. The initial Ph I Environmental Site Assessment activities have just begun, and there have been no USTs identified on this site to date.

Date Filed: October 13, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 29–30. Regarding Site #63 Berlin Settling Basin:

a. Explain the origin of contamination at this site;
b. Describe the remediation actions undertaken at this site; and
c. Provide an itemized breakdown of the remediation costs at this site.

Response:

a. The origin of the contamination is not known; however, it is suspected the area of the settling basin was formerly the location of a pole training yard that included oil filled equipment. During the conversion of the area from pole training yard to settling basin, the impacted soil was reworked to form the settling basin.

b. The remediation consisted of clearing and grubbing, excavation and disposal of impacted soil, consolidation of PCB impacted soil, confirmation soil sampling and analyses, restoration of the site with a new underground stormwater detention system, installation of groundwater monitoring wells, and groundwater monitoring. Remaining PCB impacted soil was placed under four feet of clean fill and a marker layer to provide warning in the event excavation was required in the future. Some of the remediation extended to depths of approximately 24 feet below the ground surface which required sheet pile installation and removal. Following remediation, the groundwater was monitored to determine compliance with regulations, and an Environmental Land Use Restriction and a Federal Deed Restriction was placed on the site.

c. An itemized breakdown of the remediation costs from 2017 to 2025 is included in RSR-039, Attachment 1.

Date Filed: October 14, 2026

Witness: Marc J. Richards and Gary A. Iadarola
Request from: Public Utilities Regulatory Authority

Question:

(ENVIRONMENTAL REMEDIATION) Describe the circumstances that would lead to CL&P receiving proceeds from an insurance claim. Additionally, provide an unlocked Excel workbook showing the insurance proceeds received for each site and for each year from Jan. 1, 2017, to Dec. 31, 2025.

Response:

An insurance claim for environmental remediation could be filed under the Company All- Risk Property insurance policy. Recovery would be subject to the claim being related to insured property damaged from an insured event as defined under the policy. There have been no insurance proceeds received for these sites.

Date Filed: October 13, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Explain how to cross-reference and identify related charges between the two worksheets "CLP-REVREQ-4" and "Non-Billable Reason."

Response:

The Excel version of Exhibit CLP-REVREQ-4, worksheet "CLP-REVREQ-4" presents the Third Party Pole Make Ready O&M Costs by vendor and invoice in Col (B) and Col (D). Copies of the supporting invoices are provided in Exhibit CLP-REVREQ-4(A-1) through (A-61). The Exhibit and page reference for each invoice is provided in Col (AA) and Col (AB) of worksheet "CLP-REVREQ-4". Worksheet "CLP-REVREQ-4" also provides the work orders that each invoice was charged to in Col (E). In many cases, a vendor will include costs for multiple work orders on a single invoice. Worksheet "Non-Billable Reason" provides the Third Party Pole Make Ready O&M Costs by work order, as shown in Col (B). This is the level at which work is determined to be either billable or non-billable. This is why two worksheets are required to present the information. To cross reference the two worksheets refer to Col (E) "Work Orders" of Worksheet "CLP-REVREQ-4" and Col (B) "Field Work Orders" of Worksheet "Non-Billable Reason".

Date Filed: October 15, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Define each code in worksheet "Non-Billable Reason" under the "field work order" column for lines 7,501 through 7,548. For each code show how the associated deferred expenses (or refunds) are associated with allowable deferred make ready expenses.

Response:

Please refer to Table 1 below for a summarization of the different codes for lines 7501 through 7547.

Table 1

	Amount
Cancellations	(213,805)
CR DERIVATION	287,580
CR DERIVATION TRUEUP	4,482,845
MISC CR ADJUSTMENT	26,340
SCI	38,044
SCL	1,780,780
SCR	(1,794,067)
UVL	2,598,176
UVR	(2,373,203)
SUN	(11,854)
LOADER	173,302
Overhead	140,124
Total	5,134,261

CR DERIVATION TRUEUP makes up a majority of the total. Derivation true ups are any change in the work order estimate throughout its life cycle. The process as currently designed assigns a default Federal Energy Regulatory Commission (FERC) split between capital and expense to a work order when the header initially passes from Work Management to PowerPlan. Once the design is complete and the work order progresses to construction, an updated FERC split between capital and expense is sent from Work Management to PowerPlan. Once construction is

completed, and all invoices are received, drawings are finalized and the pre-requisites/tasks in the work order system are complete, the final as-built is sent from Work Management to PowerPlan with one final updated FERC split between capital and expense. These updates trigger the derivation true up and any dollars on the work order are trued up to the updated accounting.

Please refer to RSR-042, Attachment 1, for the make ready work order details supporting the CR DERIVATION TRUEUP amount.

The SCL (Supply Chain Liability), SCR (Supply Chain Reversal), UVL (Unvouchered Liabilities), and UVR (Unvouchered Reversal) codes represent accrual activity with SCL being a system generated accrual and UVL being a manually generated accrual, with SCR and UVR being the automatic reversals of the accruals in the following month.

The remaining codes include cancellations, which reflect cancelled work order activity, CR DERIVATION, which is the work order split between capital and expense, MISC CR ADJUSTMENT, which reflects journal entry activity, SCI (Supply Chain Inventory), which are transactions from the Maximo inventory system, and SUN (Sundry Billing), which reflect transactions from the Sundry Billing system that record miscellaneous billing activity. LOADER and overhead are indirect costs calculated on the direct charges (outside services, materials, etc.).

Line 7548 reflects the amounts recovered in distribution rates ($802,869 annually), so the deferral is reduced by that amount each year (2023-2025). The 2022 deferral covering the period May through December was not reduced because the Company incurred over $1 million of make ready O&M from January through April that was not deferred.

In Docket No. 19-01-52RE01, PURA directed the Company to defer incremental non-billable make-ready costs (see Docket No. 19-01-52RE01 Final Decision dated May 11, 2022 at page 45). Consistent with this directive, the Company deferred incremental non-billable O&M make-ready costs to a regulatory asset which includes each of the accounting designations above and is being sought for recovery in this rate amendment application as supported by Exhibit CLP-REVREQ-4.

Date Filed: October 13, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Explain the following regarding the worksheet "Non-Billable Reason" for work labeled "Prior to 5/11/22" under the "Non-Billable Reason" Column:

a. Define what "Prior to 5/11/22" means in this worksheet and whether this indicates that work was done prior to May 11, 2022; and
b. Describe the billable and non-billable cost allocation standards in place prior to May 11, 2022.

Response:

a. The designation "Prior to 5/11/22" in the worksheet "Non-Billable Reason" identifies pole attachment applications that were received before May 11, 2022, the date the final decision in Docket No. 19-01-52RE01 was issued. The decision required the Company to track and categorize non-billable make ready work, and the Company implemented the tracking requirements as of that date. Therefore, "Prior to 5/11/22" refers to the application receipt date and does not necessarily indicate when the associated make ready work was performed.

b. Prior to May 11, 2022, the Company utilized the same billable and non-billable cost allocation standards used after that date to determine whether make ready work was billable or non-billable. The issuance of the final decision in Docket No. 19-01-52RE01 did not change the underlying standards used to make that determination.

   The primary change resulting from the decision was the requirement for the Company to track and categorize non-billable reason classifications, as reflected in the worksheet "Non-Billable Reason". Prior to May 11, 2022, the Company did not separately track non-billable work using those classifications.

Date Filed: October 13, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Provide an updated exhibit showing the following:

a. date work orders were initiated;
b. date work associated with work orders was completed; and
c. date work orders were closed out.

Response:

Please refer to RSR-044, Attachment 1, which contains work order level data, including (a.) date work orders were initiated (b.) date work associated with work order was completed, and (c.) date work orders were closed out.

During the data extraction process, it was determined that many entries in Exhibit CLP-REVREQ-4 contained multiple work order numbers within a single line item. To provide complete and accurate work order level information, the work order numbers had to be extracted and listed in a supplemental report. As a result, RSR-044, Attachment 1, does not correspond line-for-line with Exhibit CLP-REVREQ-4. Work orders appearing in the supplemental file should be matched directly to the work order numbers listed in Exhibit CLP-REVREQ-4.

The following key applies to the Work Order Status field in the supplemental file:

STATUS CODE	DESCRIPTION
90	Closed in Eversource's previous work management system
4X or 5X	Cancelled in Eversource's previous work management system
APPR	Approved
CAN	Cancelled
CANCLOSE	Cancelled and Closed
COMP	Complete
DSINPRG	Design in Progress
INPRG	In Progress
PCLOSE	Pending Close
RDISP	Ready for Dispatch
WTBS	Waiting to be Scheduled

Date Filed: October 13, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Explain what "Priority" means under column "Non-Billable Reason" and explain how charges under this code satisfy the criteria for non-billable make ready work.

Response:

'Priority' is an internal Company work classification used to identify make-ready work requiring expedited completion due to safety, reliability, operational, or other urgent system considerations. The Priority designation reflects the need to perform the work on an accelerated basis and is distinct from other non-billable categories associated with specific pre-existing conditions, such as clearance violations, loading violations, or defective poles.

Costs classified under the 'Priority' non-billable reason satisfy the Company's criteria for non-billable make-ready because the underlying work was required to address conditions that the Company was obligated to correct independent of a third-party attachment request. As a result, the work would have been performed regardless of whether an attachment application was submitted and was not incurred solely to accommodate a new attachment. Accordingly, these costs are properly classified as non-billable make-ready costs.