STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

September 4, 2026
Docket No. 25-12-13 & 26-05-10

Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 25-12-13 - Application of the Connecticut Light and Power Company d/b/a Eversource Energy for Order to Securitize 2018-2023 Catastrophic Storm Costs

Docket No. 26-05-10 – Application of CL&P dba Eversource Energy to Amend its Rate Schedule

Dear Commissioners:

The Office of Education, Outreach, and Enforcement respectfully (EOE) objects to the Motion for Approval of Order Number 3 (Motion) filed by The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company") on August 31, 2026.[1] In the Motion, Eversource requests approval of the existing text in the Emergency Response Plan (ERP) Compensation Plan or, in the alternative, evaluate this issue in the Company's current rate case instead of revising the Compensation Plan as the Authority ordered it to. EOE agrees with the OCC that, "Eversource had its opportunity to oppose the Decision and that opportunity has passed," the current proposal from the Company appears not to comply with what the Authority ordered in Docket No. 25-12-13, and that the Authority can deny the Motion. OCC Motion No. 38 Objection, Docket No. 26-05-10 – Application of CL&P dba Eversource Energy to Amend its Rate Schedule, Sept. 2, 2026, pp. 1-2.

Order Number 3 states,

> No later than August 31, 2026, the Company shall, in consultation with the OCC, submit to the Authority for review and approval a revised compensation policy that permits ERP Awards only for ERP Level 3 events or more severe, consistent to the greatest extent possible with its New Hampshire and Massachusetts affiliates, and that excludes a minimum of nine overtime hours before an ERP Award applies, as discussed in Section III.F.2.b, Exempt Employee Emergency Response Plan Payments.

[1] The Company cross filed this motion in two dockets appearing as Motion No. 38 in Docket No. 26-05-10 and Motion No. 45 in Docket No. 25-12-13.

Final Decision, Docket No. 25-12-13, Application of the Connecticut Light and Power Company d/b/a Eversource Energy for Order to Securitize 2018-2023 Catastrophic Storm Costs, July 29, 2026, p. 144. The Authority clearly articulated in Order No. 3 that Eversource was required to consult with the OCC to update its ERP Compensation Plan to only include ERP Awards for Level 3 events or more severe, exclude a minimum of nine overtime hours before ERP awards apply, and submit the revised plan to the Authority for approval. However, despite that clarity, it appears that Eversource did not comply with that order. The Company's Compensation Plan did not remove ERP Awards for Level 4 or Level 5 storms and did not exclude a minimum of nine overtime hours for exempt employees. Motion p. 4. Instead, the Company "questions the reasonableness of Order No. 3" and only consulted with the OCC to explain "that the Company does not support Order No. 3's change to the Policy." Motion pp. 4-5. The Company then filed this Motion which only provided parts of a Compensation Plan with the very same language as the Authority contemplated and ordered the Company to change. Therefore, the Company's Motion does not include a Compensation Plan complying with Order No. 3, and the Authority can deny this motion.[2]

Sincerely,
By: /s/*Brittany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

[2] The Authority is statutorily permitted to order "changes in the manner of operation, as may reasonably be in the public interest." General Statutes § 16-11. Once an order is issued by the Authority, a public service company is then required "obey, observe and comply with… each applicable order made… by the Public Utilities Regulatory Authority by virtue of this title as long as the same remains in force." General Statutes § 16-41

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Sincerely,

By: /s/ *Alexander Sahi*
Alexander Sahi
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement