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

November 20, 2026
In response to Motion No. 117

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

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Commissioners,

The Office of Education, Outreach and Enforcement (EOE) respectfully objects to Motion No. 117, Eversource Motion to Admit Evidence and Reconsideration of Legal Conclusions on the Propriety of an Amendment of the Rate Application (Motion) filed by The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource or Company) on November 13, 2026. In this Objection EOE would like to echo the concerns raised by the Office of Consumer Counsel's Objection filed November 19, 2026 (OCC Objection) and would like to add a few additional comments.

In its Objection, OCC notes that Eversource refers to the First, Second, and Third Supplemental Additions as exactly what they are "Supplemental Additions" and concludes that "[i]t is difficult to argue one has a legal right to add something to a rate application that has been deemed complete. Logic would indicate either the application was incomplete or the addition is unnecessary." OCC Objection, pp. 2-3. EOE agrees with this observation. In its First, Second, and Third Supplemental Additions, Eversource added 120 projects to its initial Exhibit CLP-ADDITIONS-4 (79 projects in CLP-ADDITIONS-4 Supplemental, 21 projects in CLP-ADDITIONS-4 Supplemental 2, and 20 projects in CLP-ADDITIONS-4 Supplemental 3).[1] Those 120 projects are in addition "to the 281 projects commenced and completed prior to December 31, 2025, for review in this proceeding, totaling 401 capital projects (netting out the projects already subject to a prudence review through the ESI mechanism)." Motion, p. 26. However, EOE does not believe Eversource adequately describes the additions included in the Supplemental Additions. To the contrary, the additions include more than just the number of projects.

Looking at the "Project Specific Pre 2022" tab in all four CLP-ADDITIONS-4 exhibits, 167 projects increased in cost from the prior version; some of which increased in each of the supplements after the initial filing. For example, in CLP-ADDITIONS-4, the Capital Additions - In Service total for Project CD01132, Line No. 432, was $4,560,588. CLP-ADDITIONS-4

[1] The Company notes that it "decided that it will not file any further supplemental additions after January 15, 2027." Motion, p. 25. At this time, EOE is unaware of how many more projects will be added by January 15, 2027, and EOE does not believe it is appropriate for the Company to continue to add new projects mere weeks before the evidentiary hearings begin.

Supplement increased the total for that project by $1,763,119. CLP-ADDITIONS-4 Supplement 2 increased it by $249,431, and CLP-ADDITIONS-4 Supplement 3 increased it by $12,227. In total, this project increased by $2,024,777 from the initial filing in CLP-ADDITIONS-4 to CLP-ADDITIONS-4 Supplement 3, and the Capital Additions - In Service costs in total for Project Specific Pre 2022 increased by $42,643,077 since Eversource's application.[2] The necessity of these Supplemental Additions would mean that the application was incomplete at the time of filing or these additions are unnecessary.

EOE uses this example to demonstrate that Eversource has a right to defend its due process rights, but it is the Authority's duty to consider the due process rights to all parties of this proceeding. See Tr. August 11, 2026, pp. 98-99. (This concept was also discussed during the August 11, 2026, Scheduling Conference, where OCC stated: "I've heard a lot of arguments about due process and fundamental fairness here and last year, and I guess my thought is at some point that has to apply to us as well. If we receive an application on July 14th, and we're not really receiving the majority of the application until December, and we're then supposed to conduct a hearing on that in January, and we've had no opportunity to explore it whatsoever, we've been prejudiced by this process, or we can't meaningfully participate in this process.") The parties in this proceeding have a right to meaningfully review those additional costs.

Ultimately Eversource has the burden to prove its case, but they cannot attempt to meet that burden at the expense of the due process rights of the other parties.[3] See Tr. August 11, 2026, pp. 105-106 ("In other words, if you submit an incomplete application, are you opening yourself up to a weaker substantiation in terms of meeting that burden, if that makes sense?"; "[T]he company certainly wants to provide the evidence to meet that burden of proof…. [W]e don't think the company is going to be able to do that. We haven't received the information.").

For the reasons discussed above, in OCC's objection, and as discussed during the August 11, 2026, Scheduling Conference, EOE respectfully requests that the Authority deny Motion No. 117. EOE thanks the Authority for its consideration of this matter.

Sincerely,

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

[2] As EOE's example only discusses the projects included in the "Project Specific Pre 2022" tab, it is reasonable to assume the total additional costs in the First, Second, and Third Supplemental Additions of CLP-ADDITIONS-4 costs far exceed $42,643,077 if the other three tabs were incorporated.

[3] Tr. August 11, 2026, p. 99. ("But I guess, again, very mechanically and legally, wouldn't that be a - wouldn't the relief you request then at some future point be to say, hey, PURA, this stuff that just came in months late you just shouldn't consider because we have a due process violation here as opposed to what you're asking.")

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/*Brittany Wyman*
Brittany Wyman
Staff Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement