Date Filed: October 28, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Identification of the Covered Individuals and their cost to the Company.)
(a) Identify each Covered Individual by name, title, employer entity, and date of hire;
(b) for each, state total compensation for the Test Year and the Rate Year as proposed, separately showing base salary, annual incentive, long-term incentive (performance shares and restricted share units), pension and supplemental retirement accruals (including under the Eversource Supplemental Executive Retirement Program), deferred compensation, perquisites, and all other compensation;
(c) state the dollar amount and percentage of each component that is charged or allocated to the Company, the allocation method and factor applied (ESC allocation, direct charge, or otherwise), and the FERC account(s) and the schedule and workpaper in this docket in which each amount appears; and
(d) if group
i. of the definition of Covered Individual yields individuals different from group
ii. explain the difference and provide the ranking of the twenty most highly compensated individuals whose compensation is charged or allocated in any part to the Company, with the amount so charged for each.

Response:

Eversource objects to this request. Under Connecticut case law, evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the hearing and provide the factual foundation upon which an agency decision may rely. Therefore, discovery is limited to information that is "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the

subject matter involved in the pending action . . . ." Consistent with these principles, "[i]t is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Similarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Under Conn. Gen. Stat. § 4-178, PURA shall, as a matter of policy, exclude irrelevant, immaterial or unduly repetitious evidence. All of this requested information is the subject matter of other questions propounded by OCC and PURA and the Company is responding to those questions.