STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	**DOCKET NO. 26-05-10**
	:	**AUGUST 7, 2026**

OBJECTION OF THE CONNECTICUT LIGHT AND POWER COMPANY TO MOTION OF ALLCO FINANCE LIMITED FOR PARTICIPANT/INTERVENOR STATUS (MOTION NO. 024)

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," the "Company," or "CL&P") timely files this objection to the motion for participant/intervenor status (the "Motion"),[1] dated August 1, 2026, of Allco Finance Limited ("Allco"). The Motion is designated as Motion No. 024 in the above-captioned proceeding. The Motion requests intervenor/participant status based on Allco's claim that it is a "ratepayer and . . . developer and owner of solar photovoltaic projects in Connecticut." Motion at 1.

The Motion is deficient and should be denied because: (1) Allco's interests as a "ratepayer" are already represented by the Office of Consumer Counsel ("OCC"); (2) Allco's interests as a "developer and owner of solar photovoltaic projects in Connecticut" are represented by the Interconnection Customer Coalition ("ICC"); (3) the Motion fails to demonstrate that Allco's participation will furnish assistance to the commissioners in resolving the issues of the contested case; and (4) the orderly conduct of this proceeding will be adversely impacted if Allco is allowed

[1] Participants are persons granted permission by PURA to take part in an uncontested proceeding. See Conn. Agencies Regs. § 16-1-135. For contested proceedings, PURA may grant party or intervenor status. See id. §§ 16-1-17 & 16-1-18. Because Allco has not demonstrated (and cannot demonstrate) that its legal rights, duties or privileges will be determined by the decision to be issued in this proceeding as required by Conn. Agencies Regs. § 16-1-17 to be designated as a party to this proceeding, Eversource's objection treats the Motion as an application to be an intervenor pursuant to Conn. Agencies Regs. § 16-1-18.

to litigate disputes wholly separate and unrelated to this rate case proceeding. For these reasons, the Motion does not meet the standard for intervenor status required by the Public Utilities Regulatory Authority ("PURA") under Conn. Agencies Regs. §16-1-18 and should therefore be denied. The Company has no objection to Allco participating in this proceeding as part of the ICC along with other large solar developers.

I. BACKGROUND ON ALLCO

Allco states that it is a developer of renewable energy projects whose "corporate mission is to combat climate change, ensure a full accounting of the economic and health burden on ratepayers from current energy policy, enforce laws that benefit developers of solar energy developers [sic] on a broad scale and fighting the devastating environmental impacts from burning fossil fuels, including without limitation the adverse effects that continued use of fossil-fuel generation will have on humans and endangered species." Motion at 1.

Allco should be familiar to PURA because Allco has sued both PURA and the Department of Energy and Environmental Protection ("DEEP") seeking, among other things, relief for its proposed solar projects. See, e.g., Allco Fin. Ltd. v. Klee, 861 F.3d 82 (2d Cir. 2017), cert. denied, 138 S.Ct. 926 (2018)(Allco lawsuit against Robert J. Klee, Commissioner of DEEP, and Katherine S. Dykes, John W. Betkoski, III, and Michael Caron, Commissioners of PURA); see also Allco Renewable Energy Ltd. v. Massachusetts Elec. Co., 875 F.3d 64 (1st Cir. 2017) (Allco Renewable Energy Ltd. lawsuit against electric company and various Massachusetts Department of Public Utilities officials); Winding Creek Solar LLC v. Peterman, 932 F.3d 861 (9th Cir. 2019)(suing Commissioners of the California Public Utilities Commission).

Allco and its affiliates have previously intervened in PURA dockets to litigate disputes outside the scope of the underlying proceeding, ultimately serving Allco's unrelated business

interests rather than furnishing assistance to PURA on issues within scope of the proceeding. For example, Allco's affiliate was granted permission to intervene in Docket No. 23-12-20, PURA Review and Approval of Pro Forma Tariffs Pursuant to Section 16-243a-2 of the Regulations of Connecticut State Agencies, where PURA evaluated, in an uncontested proceeding, tariffs submitted by CL&P and The United Illuminating Company to comply with the PURA's regulations that implement the federal Public Utility Regulatory Policies Act ("PURPA") of 1978. See, Docket No. 23-12-20, January 17, 2024, ruling on Motion No. 003.

Identical to the Motion submitted in this rate case proceeding, Allco requested intervenor status as both a "ratepayer" and "developer and owner of solar photovoltaic projects." Docket No. 23-12-20, Motion No. 003 at 1. After being granted permission to intervene, Allco's affiliate: (1) filed written comments seeking higher compensation for its renewable projects (Docket No. 23-12-20, February 21, 2024, written comments at 7-9); (2) issued a Notice of Deposition seeking to depose one or more of the Company's witnesses outside of the established discovery process (Docket No. 23-12-20, March 29, 2024, correspondence); and (3) issued interrogatories to CL&P and The United Illuminating Company on a variety of topics outside the scope of the proceeding, including, but not limited to, matters pertaining to third-party retail suppliers (Docket No. 23-12-20, Q-ALLCO-001), "load reducers" (Docket No. 23-12-20, Q-ALLCO-003), and offshore wind facility bids (Docket No. 23-12-20, Q-ALLCO-007 through Q-ALLCO-012).

Allco was also granted permission to intervene in Docket No. 24-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company. See, Docket No. 24-01-03, March 13, 2024, ruling on Motion No. 008. Identical to the Motion submitted in this rate case proceeding, Allco requested intervenor status as both a "ratepayer" and "developer and owner of solar photovoltaic projects." Docket No. 24-01-03, Motion No. 008 at

1. Among other reasons, CL&P opposed this request on the basis that Allco's intervention would adversely impact the orderly conduct of the proceeding if Allco were allowed to litigate matters unrelated to the Revenue Adjustment Mechanism ("RAM") proceeding. Docket No. 24-01-03, CL&P Objection to Motion No. 008 at 1. As an example, CL&P warned that Allco wanted to make arguments that Allco's renewable projects are "load reducers," which would be outside the scope of the RAM proceeding and was the already subject of an unrelated pending proceeding (Docket No. 23-12-20). See id. at 6-7. Not long after being granted permission to intervene, Allco issued interrogatories to CL&P on the subject of "load reducers." See, Docket No. 24-01-03, Q-ALLCO-004 & Q-ALLCO-027.

More recently, Allco's litigation tactics are the subject of a pending public disciplinary matter before the Vermont Professional Responsibility Board. A copy of The Petition of Misconduct in that matter is attached hereto as Attachment 1. The Petition of Misconduct alleges, among numerous other alleged ethical violations, that Allco's principal intervened in an unrelated municipal redevelopment project by appealing a town's decision to enter into a contract for the project as "municipal waste" and then offered to withdraw Allco's appeal and not oppose the town's redevelopment project in exchange for the town withdrawing its opposition to an unrelated proposed Allco solar photovoltaic project. See, Petition of Misconduct at 11-13.

II. ALLCO HAS NOT SATISFIED THE REQUIREMENTS TO BE GRANTED INTERVENOR STATUS

Conn. Agencies Regs. § 16-1-18 establishes the process by which a person or entity may be allowed to participate in a contested case proceeding. A person or legal entity cannot claim intervenor status by right, but rather such status is allowed only in the discretion of the presiding officer. PURA requires the petitioner to "describe the manner in which said person is affected by the contested case," and to "further state in what way and to what extent that person proposes to

participate in the hearing." Conn. Agencies Regs. §16-1-18(b). Based on this information, "the presiding officer will determine the proposed intervenor's participation in the hearing, taking into account whether or not such participation will furnish assistance to the commissioners in resolving the issues of the contested case." Conn. Agencies Regs. §16-1-18(c).

In the Motion, Allco alleges it should be granted intervenor status because it has an "interest as a ratepayer and as the developer and owner of solar photovoltaic projects in Connecticut" (Motion at 1). The following subsections demonstrate that this claim is insufficient to justify granting Allco's Motion.

a. Allco's Interest as a "Ratepayer"

The Motion fails to provide a basis on which PURA may distinguish Allco's interest as a "ratepayer" from that of numerous other individual customers of the Company. The interests of all customers of the Company, including those of Allco, are fully represented in this proceeding by the OCC, which is the designated "advocate for consumer interests in all matters which may affect Connecticut consumers with respect to public service companies . . . including, but not limited to, rates and related issues . . . ." Conn. Gen. Stat. §16-2a. As to the issues that PURA may review in this case relating to customers such as Allco, those issues will be fully joined and addressed through the participation of the OCC. Participation by Allco as an intervenor would therefore be duplicative of the participation by the OCC and would impair the orderly conduct of the proceeding.

In addition, if individual customers, such as Allco, are permitted to participate as intervenors in this rate case proceeding, it will create significant challenges to PURA to conduct the case in an orderly and timely fashion. The Company has approximately 1.3 million customers.

While CL&P welcomes the input of all its customers, individual customers should not be allowed to participate as intervenors.

b. Allco's Interest as a "Developer and Owner of Solar Photovoltaic Projects"

Allco next alleges it should be granted intervenor status because it has a "substantial interest as a . . . developer and owner of solar photovoltaic projects in Connecticut" and "Allco brings a perspective that no other participant [sic] offers." Motion at 1 & 3. These claims are deficient for several reasons.

First, Allco's interest as a "developer and owner of solar voltaic projects" is irrelevant to the subject matter of this rate case proceeding. This docket will not adjudicate solar energy policy. PURA's June 2, 2026, Notice of Proceeding issued in Docket No. 26-05-10 specifically states that this a contested proceeding to review the Company's application to amend its existing rate schedules.

Second, Allco's interest as a "developer and owner of solar photovoltaic projects" is already represented by the ICC, which was recently granted permission to intervene. See Docket No. 26-05-10, August 5, 2026, ruling on Motion No. 021. In fact, Allco appears to have copied nearly verbatim from paragraphs 3, 4, and 5 of ICC's Motion No. 21 for paragraphs 5, 6, and 7 of Allco's own Motion. Allco thus does not, as it claims in its Motion, bring a perspective that no other prospective intervenor offers. See Motion at 3. The ICC, which is comprised of Verogy, Earthlight Technologies, and Greenskies Clean Energy, three of the largest solar developers in Connecticut, make practically the same claim in the earlier-filed Motion No. 021. See Docket No. 26-05-10, Motion No. 021 at 3. For the orderly conduct of this proceeding, because Allco can participate in this proceeding with similarly situated developers as part of the ICC, PURA should deny the Motion.

Third, the only unique perspective that Allco offers to bring to this proceeding is irrelevant to the proceeding. Allco openly represents in its Motion that Allco intends to litigate matters outside the scope of this rate case proceeding, namely, CL&P's charging of overheads on interconnection projects, interconnection cost refunds allegedly owed to Allco by the Company, and CL&P's retention of Allco deposits, performance assurances, and refunds. See, Motion at 3. These matters are clearly outside the scope of this proceeding. Allco is again requesting to intervene for the purpose of serving its unrelated business interests rather than furnishing assistance to PURA on issues within scope of the proceeding. Allco tries to bring its dispute over the charging of overheads into the scope of this proceeding by baselessly claiming that "on information and belief" these charges "are reflected in the revenue requirement, operation and maintenance expenses, and capital cost recovery that Eversource asks ratepayers to bear in this docket." Id. However, even if PURA were to assume the veracity of this claim, the issue of the amounts that ratepayers are being asked to bear is fully represented in this proceeding by the OCC.

In addition, Allco previously attempted to litigate CL&P's charging of overheads on interconnection projects at the Federal Energy Regulatory Commission ("FERC") when it filed a petition seeking to initiate an enforcement action against PURA. See, Allco, Petition for Enforcement Under the PURPA of 1978, Docket Nos. EL25 117 *et al.* (filed September 23, 2025). However, FERC declined to initiate an enforcement action and stated that Allco may itself bring an enforcement action against PURA in the appropriate court. See, Allco, Notice of Intent not to Act, Docket Nos. EL25 117 *et al.* (issued November 21, 2025). To the best of CL&P's knowledge, Allco has not brought an enforcement action against PURA in court to-date. Allco should not be allowed to litigate this matter in CL&P's rate case proceeding.

III. CONCLUSION

For these reasons, the Company objects to the Motion and requests that the Motion be denied. PURA is required by statute to issue a final decision on the Company's rate filing no later than 350 days after the effective filing date of the proposed amendment. See Conn. Gen. Stat. § 19-19(a). Considering the breadth of issues for PURA to evaluate in this fixed timeframe and that Allco's interests are currently represented by other intervenors, the importance of the orderly conduct of this proceeding necessitates that PURA deny the Motion. If Allco wishes to participate in this proceeding, it can do so with similarly situated developers as part of the ICC.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY
DBA EVERSOURCE ENERGY

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CERTIFICATION

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

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