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May 29, 2026

VIA ELECTRONIC FILING

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
Ten 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 – Rate Case Filing Logistics Update

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company") hereby provides an update to the Public Utilities Regulatory Authority ("PURA") on certain filing logistics pertaining to the Company's upcoming rate case.

As an initial note, the Company raised the logistical matters discussed herein with PURA in undocketed correspondence dated May 5, 2026, and PURA's Office of Education, Outreach, and Enforcement ("EOE") and the Office of Consumer Counsel ("OCC") individually responded to that correspondence on May 13, 2026. On May 28, 2026, Eversource requested and participated in a meeting with EOE and OCC for the purpose of seeking input and feedback from the two state parties that regularly conduct the most significant and thorough review of utility rate case applications in PURA's proceedings. Eversource's intention in requesting this meeting was two-fold, attempting to set a course to prepare documents in a format that would be more easily accessible by reviewing parties during the proceeding, including by EOE and OCC, and to invoke a more collaborative approach to ease administrative burdens over the course of the proceeding. In particular, the Company is sensitive to concerns raised by the OCC in the recent Yankee Gas rate proceeding regarding presentation of core documentation[1] and sought to resolve hearing-flow concerns that the Company perceived were caused by large file size documents in the recent storm review proceeding.[2]

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[1] Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, OCC's Larkin-Connolly Capital Additions Testimony, dated March 13, 2025, at 26-28.

[2] 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, Tr. 3/24/26, at 69; Tr. 3/25/26, at 12-13; Tr. 4/1/26, at 53.

The Company received constructive feedback from OCC and EOE at the May 28, 2026 meeting regarding the presentation and format for approximately 300,000 pages of bulk invoice documentation containing vendor pricing and bulk capital-project documentation that the Company expects to submit as part of its application. The Company left the meeting with the impression that there were mutually agreeable outcomes on a number of issues, including the general presentation and format for the bulk documentation. OCC and EOE expressed concerns,[3] however, about redactions and access to non-confidential versions of the bulk documentation that would be filed confidentially pursuant to a motion for protective treatment.[4] In response to those concerns, the Company offered a number of accommodations and protections that could be reasonably implemented to maintain adequate public access to non-confidential information over the course of the proceeding, including approaches Eversource's regulator in Massachusetts has determined to be reasonable in rate cases. Therefore, the Company intends to present its bulk documentation in a manner that considers the helpful feedback received from OCC and EOE, while incorporating the accommodations and protections summarized below.

1. **Bulk Invoice Documentation**: Stakeholder feedback indicates to the Company that its prior practice of providing combined pdfs with hundreds of invoices in one pdf file remains preferable for OCC and EOE, notwithstanding the Company's concern that the large pdf files are difficult to navigate in the hearing room. As a result of this discussion, the Company plans to create combined pdfs with subparts with a maximum file size of 40MB to ensure the files open smoothly during hearings. For bulk invoice documentation, the Company plans to create a Master Index listing of invoices by topic that will be available to the public to provide an overview of costs by invoice or on a line-by-line basis, along with a reference to the exact file and page location of the supporting invoice documentation, although the invoice documentation itself would remain subject to protective treatment due to commercially sensitive information.

2. **Capital Project Documentation**: The Company plans to present capital project documentation in a "folder" structure where all documents for each individual capital project are located in a unique folder tied to a line number on the Master Index of capital projects and assigned a specific project identification number. The Master Index will list all capital projects, the associated costs, variances and other data fields, while the folder structure will allow reviewing parties to quickly and easily locate all documents associated with the specific capital project. In the recent Yankee Gas rate case, OCC expressed a desire for Eversource to follow its filing practices in Massachusetts. This is exactly what the Company is planning to do here, absent

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[3] *See* May 13, 2026 Undocketed Correspondence from OCC and EOE, *available at*: https://www.dpuc.state.ct.us/DPUCUndocketed.nsf/c8f9534162d6bc06852588cb0069a8e4/caa0f32491701a4485258df6006d8a1f/$FILE/Response%20to%20Eversource%20Undocketed%20Correspondence.pdf and https://www.dpuc.state.ct.us/DPUCUndocketed.nsf/c8f9534162d6bc06852588cb0069a8e4/fc9cd65d419bf7e785258df6004a2ff9/$FILE/EOE%20Response%20to%20ES%20Undocketed%20Corr.pdf .

[4] The Company estimates that the cost of redacting and providing fully public versions of all of the approximately 300,000 pages of bulk documentation would approach $ 800,000, which is unreasonable in itself and unreasonable in light of the accommodations and protections the Company has offered to maintain public availability of non-confidential information of genuine interest.

direction to the contrary. In Massachusetts, the MDPU requires preparation of a detailed Master Index listing all capital projects, the associated costs and other pertinent data. Eversource then files supporting documentation on a flash drive in the same folder structure that the Company plans to utilize in the upcoming case, with all project documentation for a given project under one folder identified by project number. The MDPU protects all documents in that folder structure as confidential and does not require redactions to the folder information. Then, if questions arise during discovery about an individual project, Eversource is required to submit redacted project documentation for that individual project into the record as part of the discovery response. The Company plans to follow the same practice for its Connecticut rate case, absent further direction from PURA.

3. **Protective Treatment.** In order to maintain public availability of non-confidential information contained within bulk documentation, the Company plans to take the following steps:

(a) The Company will develop a public Master Index by topic area (for environmental, storms, and make-ready bulk invoices, and for capital additions project documentation). The Master Index will provide the public with substantial detailed non-confidential information, with information on total cost and other relevant data, by invoice or by project on a line-by-line basis, without providing the support documentation wherein confidential information is contained.

(b) During discovery and through hearings, including late-filed exhibit hearings, the Company will provide redacted versions for individual invoices and individual capital project documents that are identified for further inquiry by the state parties, consistent with the practice in Massachusetts.

(c) To the extent state parties wish to inquire about non-confidential information contained in the bulk documents during public hearing sessions and they have not previously requested a redacted version of that invoice or project document, the Company agrees they can verbally identify a confidential document, identify that they do not intend to ask about a confidential category of information, and conduct cross examination as needed, provided no attorney or witness indicates the cross examination actually relates to confidential information.

(d) The Company will assist in responding to any valid and properly limited Freedom of Information Act ("FOIA") request that comes to PURA or to OCC. Contrary to some concerns expressed by others, the Company is not asking PURA to use its resources to redact Company confidential documents requested by members of the public. Instead, if any member of the public seeks unredacted copies of vendor invoices, then PURA can

notify the Company, and the Company will promptly prepare redacted copies that can be disclosed to the requesting member of the public.

The Company greatly appreciates that EOE and OCC were willing to meet to discuss logistical matters regarding the upcoming rate proceeding and appreciates the constructive feedback obtained from EOE and OCC on the presentation and format of bulk documentation. However, it remains unclear to the Company whether EOE and OCC are willing to support a consensus direction. The Company is aware that the OCC has requested a technical meeting in this proceeding to further discuss the Company's rate case filing, apparently focused on the 300,000 pages of bulk documentation.[5] The Company certainly will participate in a technical meeting in the event that PURA deems it appropriate to conduct the meeting; however, PURA has ample precedent allowing protection of bulk filings provided in confidential-only version where: (1) the bulk documentation contains commercially sensitive or otherwise confidential information; and (2) it is not feasible to redact the bulk documentation *en masse*.[6]

Production of the bulk documentation is necessary for the Company to have an opportunity to meet its burden of proof in the upcoming proceeding. However, redaction of the bulk exhibits

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[5] *See* Motion No. 3 in Docket No. 26-05-10, OCC's May 28, 2025 Motion for Technical Meeting, filed mere hours after the Company's stakeholder engagement in which OCC representatives articulated they would wait to hear back from the Company for next steps on potential engagement before PURA. *See also* May 13, 2026 Undocketed Correspondence from OCC.

[6] 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 (April 2, 2026 Ruling on Motion No. 36) (PURA protected bulk confidential documentation provided in a folder and subfolder structure, and did not require a public filing version); Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (March 26, 2025 Letter Ruling on Motion No. 59) (PURA found that the Company was not required to publicly file bulk confidential documents, where the Company argued redactions to 33,000 pages of invoices would cost $97,000 and no feasible method for redactions other than manual review existed. Thus, PURA allowed confidential-only production of thousands of pages of extreme bulk confidential attachments); Docket No. 24-03-30, Investigation of the 2018-2021 Catastrophic Storm Costs Reported by The Connecticut Light and Power Company d/b/a Eversource Energy, (August 27, 2024 Letter Ruling to Motion No. 17) (PURA protected confidential-only versions of vendor invoices in their entirety to protect the interest of customers in maintaining competitive pricing; Company had also noted that records consisted of 152,000 pages of invoices that would have cost $275,000 to $400,000 to redact, which was not reasonable); Docket No. 21-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company (March 23, 2021 Letter Ruling on Motion No. 2) (protecting bulk financial and trade secret information including vendor invoices and information for projects and programs, submitted in a folder and subfolder structure); Docket No. 20-08-03, Investigation into Electric Distribution 9 Companies' Preparation for and Response to Tropical Storm Isaias; (December 10, 2020 Letter Ruling on Motion No. 42) (protecting bulk third-party contractor invoices); Docket No. 19-03-01, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company (July 19, 2019 Letter Ruling to Motion No. 5) (protecting bulk invoices and facility and generation data in its entirety).

is not feasible as a manual process, and it would be very costly (and unreliable) to complete using automation. Connecticut statute provides applicable FOIA exemptions and exceptions that allow PURA to grant protective treatment and the Company plans to apply for protective treatment in accordance with statute in due course, consistent with PURA precedent. In advance of that filing, the Company has offered a number of accommodations and protections to ensure adequate disclosure of non-confidential information to the parties during the proceeding and to the public. Therefore, it is not clear what would need to be resolved in a technical meeting, absent additional input from PURA.

In the event that PURA has feedback on the Company's planned direction for the filing of bulk invoice and capital project documentation, the Company looks forward to obtaining that guidance, as the Company's efforts to produce the filing are ongoing. The Company also hopes that PURA is able to confirm by **June 15, 2026** its expectations and requirements for paper copies of the rate case application, which both OCC and EOE have confirmed they do not require,[7] so that the Company can plan accordingly for its July 14, 2026 filing of the full rate case application.

Please contact me if there are any questions with respect to this filing.

Very truly yours,



Tiffany N. Tisler

cc: Service List

[7] *See* May 13, 2026 Undocketed Correspondence from OCC and EOE.