Date Filed: October 22, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

(Follow-up to ALLCO-076, ALLCO-077, and ALLCO-028 — outside counsel matters in the revenue requirement.) ALLCO-076, Attachment 1 reports outside counsel expense charged to the Company of $3,834,493 (2021), $2,287,868 (2022), $4,257,622 (2023), $2,678,448 (2024), and $5,185,192 (2025), and a Rate Year amount of $5,121,457, and lists, among others, Day Pitney LLP ("Regulatory / Litigation," direct charge: $79,724 in 2023, $204,831 in 2024, $164,213 in 2025, $174,796 in the Rate Year), Cowdery Murphy & Healy LLC ("Regulatory / Litigation," direct charge: $147,160 in 2024, $511,973 in 2025, $544,967 in the Rate Year), and Keegan Werlin LLP ("Regulatory Matters," direct charge: $1,210,144 in 2025, $1,288,132 in the Rate Year). ALLCO-077 states that the Rate Year legal costs "include litigation or other proceedings in which the Company is a plaintiff or defendant" and that the Company "does not track legal costs that would allow the Company to identify the portion of costs that relate to litigation or other proceedings and then separate that portion by specific matters." (a) For each of Day Pitney LLP, Cowdery Murphy & Healy LLC, and Keegan Werlin LLP, and for each year 2023 through 2025 and the Rate Year, identify each matter (by Legal Tracker Matter # and Eversource Matter Name, or, if privilege is asserted as to a name, by category and forum) to which the amounts in ALLCO-076, Attachment 1 were charged, and the amount charged to each matter. (b) State whether any portion of the amounts in subpart (a) was incurred in connection with (i) Allco Finance Limited or any of its affiliates, including the matters settled in Docket No. 16-03-08RE01, the February 2025 settlement filed in Docket No. 25-03-12, the Company's disqualification of SCEF Year 7 bids, the retention of SCEF Year 6 bid deposits, or the interconnection, LREC/ZREC, or power purchase agreements of Allco's affiliates; (ii) Windham Solar LLC or any affiliate; (iii) any other interconnection, net-metering, SCEF, or renewable-energy-contract dispute with a customer or developer; or (iv) any proceeding in which the Company defended the prudence or lawfulness of its own conduct — and state the amount for each. (c) State the basis on which the Company contends that the Rate Year amount of $5,121,457 is a reasonable and prudent level of outside counsel expense to be recovered from ratepayers when, by its own account in ALLCO-077, it cannot identify what portion of that amount was incurred to litigate against its own customers or to defend its own conduct, and identify every adjustment the Company made to remove such costs from the Rate Year, with the amount and workpaper reference, or state that no adjustment was made. (d) State whether any fee or disbursement of Day Pitney LLP incurred in Allco Finance Limited Inc. v. The Connecticut Light and Power Company, et al., No. 3:26-cv-01277 (D. Conn.), or in the Rule 11 and related correspondence preceding it, has been or will be charged to the Company, recorded above the line, included in any deferral, or sought in this or any future rate proceeding, and identify the account(s) used. (e) Produce the Legal Tracker matter list and budget-

versus-actual report for each matter identified in subpart (a) in native format.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

(a) Only the costs incurred in 2025 are at issue in this proceeding. Costs included in the Rate Year are escalated by the rate of inflation from the test year. Day Pitney LLP assists the Company in three areas – routine business and litigation matters, regulatory matters and appellate work. Cowdery Murphy & Healy LLC assists the Company with regulatory and appellate work, and Keegan Werlin LLP assists the Company with specialized regulatory work.

(b) The Company objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

(c) The Company intends to address the prudence of costs as a legal matter. In addition, the question posed in ALLCO-077 asked for a breakdown of "the proceedings in which the Company defends the prudence or lawfulness of its own conduct…," which are false categories of legal work. The Company does not "litigate against its own customers," nor does it incur legal costs to impermissibly, improperly or inappropriately "defend its own conduct" and the Company is able to state categorically that there are zero legal costs incurred for these stated purposes.

In preparing its rate filing, the Company reviewed all of its legal costs to determine that the costs were reasonable, necessary, efficiently incurred and expected to be routinely occurring, primarily due to the need to meet increased regulatory requirements, as well as other compliance matters. The legal costs were incurred in the course of operating as a public service company in the State of Connecticut and to provide safe and reliable service to customers as a company that is rate-regulated by PURA. All of the Company's legal costs included in the revenue requirement fall within this category.

(d) The Company objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.